Appendix O

Agricultural Impact Mitigation Plan (AIMP) Example

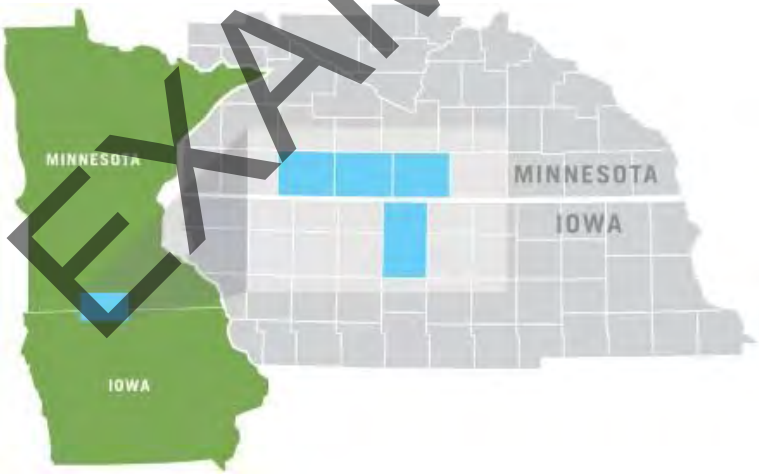
ITC Midwest's DEIS Comment Letter

ITC Midwest LLC

Agricultural Impact Mitigation Plan

Minnesota – Iowa 345 kV Transmission Project and Associated Facilities in Jackson, Martin, and Faribault Counties

EXAMPLE



Docket Nos. ET6675/CN-12-1053 & ET6675/TL-12-1337

April 29, 2014

ITC Midwest's DEIS Comment Letter

Introduction

ITC Midwest LLC ("ITC Midwest") developed this Agricultural Impact Mitigation Plan ("AIMP") with the Minnesota Department of Agriculture ("MDA") in compliance with Minnesota Statutes Section 216E.10, subdivision 3(b). The AIMP identifies measures ITC Midwest will take during construction of its Minnesota – Iowa 345 kV Transmission Project in Jackson, Martin, and Faribault counties, Minnesota ("Project") to avoid, mitigate, minimize, repair, or provide compensation for impacts on Agricultural Land. The AIMP and its provisions will be implemented during construction and restoration activities that ITC Midwest undertakes for the Project prior to filing notice of completion of construction with the Minnesota Public Utilities Commission.

Capitalized words and other defined terms have the meanings given to them in this AIMP and its appendix. Use of "Landowner" in this AIMP may be construed to read "Landowner and/or Tenant."

This AIMP and its construction standards and policies apply only to construction activities occurring on privately owned Agricultural Land. If agricultural tile is encountered, whether on Non-Agricultural Land or Agricultural Land, ITC Midwest will implement construction standards relating to the repair of tile on Agricultural Lands discussed further in this AIMP. Portions of this AIMP that identify standards and policies as they apply to Organic Agricultural Land apply only to the types of lands defined in the National Organic Program Rules (7 C.F.R. Parts 205.100; 205.101, and 205.202). Further, construction standards and policies identified in this AIMP can be modified through Easement or other agreement between ITC Midwest and the Landowner of Agricultural Land, as appropriate. In such case, the Easement or other agreement will control.

EXAMPLE

Generally

ITC Midwest will negotiate in good faith with each Landowner of Agricultural Land to secure an agreement containing the conditions or provisions necessary to implement the provisions of this AIMP. The mitigative actions set forth in this AIMP are subject to negotiation and approval or change by Landowner of Agricultural Land, so long as such changes are negotiated with and acceptable to ITC Midwest. Mitigative actions will be executed by qualified contractors retained by ITC Midwest, unless otherwise specified or agreed upon by Landowner. ITC Midwest and Landowner may agree that certain activities will be performed by Landowner. ITC Midwest maintains a damage claim policy outlining compensation policies for damage to property, including but not limited to crop damages, and will provide a copy of this policy to the Landowner during Easement acquisition negotiations.

Unless otherwise specified in this AIMP or in an Easement or other agreement negotiated between ITC Midwest and Landowner, construction standards and policies or mitigative actions will be implemented within 90 days after completion of Final Clean-up activities on Agricultural Land. Weather conditions or other circumstances identified by mutual agreement between Landowner and ITC Midwest may delay implementation of mitigative actions after final cleanup. Where practicable, ITC Midwest may make temporary repairs. These temporary repairs may be made to minimize additional property damage or interference with the Landowner's access to the subject Agricultural Land.

ITC Midwest or its contractors will implement the construction standards and policies or mitigative actions identified within this AIMP so long as such activities do not conflict with any applicable Federal or State rules, regulations, permits, licenses, approvals, or conditions obtained by ITC Midwest for the Project. Should any activity within this AIMP be determined to be unenforceable due to Federal or State rules, regulations, permits, licenses, approvals, or conditions, ITC Midwest will inform the Landowner and will identify a reasonable alternative activity.

Prior to Right-of-Way preparation for, or construction of, the Project, ITC Midwest will make a good faith effort to provide each Landowner with contact information, including a phone number and address, that can be used to contact ITC Midwest regarding any impacts to Agricultural Land or other construction-related concern or question. ITC Midwest will provide updated information to the Landowner within a reasonable time of any change to ITC Midwest contacts.

EXAMPLE

Construction Standards

Mitigative Actions
ITC Midwest will reasonably restore and/or compensate Landowner, as appropriate, for damages caused by ITC Midwest as a result of transmission line construction, and as outlined in this plan. ITC Midwest will decide whether to restore land and/or compensate Landowner after a discussion with the Landowner.

Advance Notice of Access
ITC Midwest will make good faith efforts to provide notice to the Landowner in advance of the commencement of construction activities on Agricultural Land. Notice may include personal contact, email, letter, or telephone contact.

Agricultural Monitor
An Agricultural Monitor shall be retained and funded by ITC Midwest but will report directly to the MDA. The Agricultural Monitor's primary function will be to audit ITC Midwest's compliance with this AIMP. The Agricultural Monitor will not have the authority to direct construction activities and will not have authority to stop

construction. The Agricultural Monitor will notify ITC Midwest's Inspector if s/he believes a compliance issue has been identified. The Agricultural Monitor will have full access to Agricultural Land crossed by the Project and will have the option of attending meetings where construction on Agricultural Land is discussed. Specific duties of the Agricultural Monitor will include, but are not limited to the following:

1. Participate in preconstruction training activities sponsored by ITC Midwest.
2. Monitor construction and restoration activities on Agricultural Land for compliance with provisions of this AIMP.
3. Report instances of noncompliance with the AIMP to ITC Midwest's Inspector.
4. Prepare regular compliance reports and submit to MDA, as requested by the MDA.
5. Coordinate communication of Landowner concerns to the MDA, if necessary.
6. Maintain a written log of Landowner concerns reported by the ITC Midwest Inspector and/or land rights agent regarding compliance with this AIMP. The written log should record whether the Agricultural Monitor reported each logged concern to the MDA.
7. Be responsible for determining whether weather conditions have caused the soil to become so wet that the activity to alleviate compaction would reduce the future production capacity of the land and advising ITC Midwest's Inspector of these conditions. ITC Midwest will be solely responsible in making the decision on whether it will proceed with construction under these conditions. Compensation for Landowner, as appropriate, will be determined as described in the "Procedures for Determination of Damages and Compensation" section of this AIMP.
8. In disputes between ITC Midwest and a Landowner over restoration, advise the MDA on whether the agricultural restoration is reasonably adequate in consultation with the ITC Midwest Inspector and ITC land agent.

Qualifications and Selection of the Agricultural Monitor

The Agricultural Monitor will have a bachelor's degree in agronomy, soil science or equivalent work experience. The Agricultural Monitor will have demonstrated practical experience with pipeline or electric transmission line construction and restoration on Agricultural Land. The MDA and ITC Midwest will jointly select the Agricultural Monitor.

EXAMPLE

ITC Midwest Inspector
The ITC Midwest's Inspector will:

1. Be full-time member of ITC Midwest inspection team.
2. Be responsible for verifying ITC Midwest compliance with provisions of this AIMP during construction.
3. Work collaboratively with other members of ITC Midwest's construction team, land right agents, and the Agricultural Monitor in achieving compliance with this AIMP.
4. Observe construction activities on Agricultural Land on a regular basis.
5. Have the authority to stop construction activities that are determined to be out of compliance with provisions of this AIMP.
6. Document instances of noncompliance and work with construction personnel to identify and implement appropriate corrective actions as needed.
7. Provide construction personnel with training on provisions of this AIMP before construction begins.
8. Provide construction personnel with field training on specific topics as needed.

Pole Placement
During the design of the Project, ITC Midwest's engineering, land rights and permitting staff will seek input from Landowner, as practicable, to address pole placement issues. Prior to construction, the land rights agents will review the staked pole locations with the Landowner when requested to do so by the Landowner.

Pole Removal
If the Project is constructed along an existing 69 kV or 161 kV transmission line, and ITC Midwest determines the existing facilities can be reasonably co-located, ITC Midwest may remove existing transmission line structures. For transmission line structures that do not have a footing, ITC Midwest will extract the pole from the ground if possible. In the event a pole cannot be extracted by pulling, ITC Midwest will excavate an area to uncover approximately 60 percent of the buried pole and an attempt will be made to extricate an excavated pole entirely. If an excavated pole cannot be removed in its entirety, the pole will either be cut off at the excavated depth (in the range of approximately five feet) or pushed over if the pole cannot be cut. If an existing transmission structure to be removed for purposes of the Project has a concrete footing, ITC Midwest will work with the Landowner to determine at what depth the footing must be removed so farming operations can continue on the property.

EXAMPLE

If ITC Midwest removes an existing pole, all support anchors for the structure will be removed. In these instances, ITC Midwest will work with the Landowner to identify any tile lines located near anchors prior to removal of the anchors. Additionally, if any damage to tile occurs as a result of pole or anchor removal, ITC Midwest will adhere to the "Agricultural Tile" section of this AIMP.

Substation Construction

The Project will require construction and/or expansion at two substation locations. During construction and expansion of the Huntley and Lakefield substations, respectively, ITC Midwest will segregate Topsoil that must be removed for ground work. At ITC Midwest's sole discretion, excess Topsoil may be made available to a Landowner who wishes to use this Topsoil on his or her property. If the Topsoil is made available to a Landowner in other areas of the Project, it will be provided "as is" and the Landowner, not ITC Midwest, will be responsible for verifying that the quality of the Topsoil meets the Landowner's farming requirements. The Landowner is solely responsible for obtaining any required local, state, or federal permits or permissions that may be necessary for the placement of Topsoil on his or her property.

Agricultural Tile

ITC Midwest will contact an affected Landowner for their knowledge of tile locations prior to installation of the transmission line. ITC Midwest will attempt to identify tile if the Landowner does not know if tile is located at the proposed pole location. Tile that is damaged, cut, or removed as a result of ITC Midwest's location efforts will be promptly repaired. The repair will be reported to the Inspector.

If tile is damaged by Project construction, the tile will be repaired –with materials of the same quality as that which was damaged. If tiles on or adjacent to the transmission line construction area are adversely affected by construction, ITC Midwest will take such actions as are necessary to restore the tile function, including the relocation, reconfiguration, and replacement of the existing tile. ITC Midwest will correct tile repairs, as needed, after completion of the transmission line construction, provided the repairs were made by ITC Midwest or their agents or designees.

The affected Landowner may elect to negotiate a fair settlement with ITC Midwest for the Landowner to undertake the responsibility for repair, relocation, reconfiguration, or replacement of damaged tile. In the event the Landowner chooses to undertake the responsibility for repair, relocation, reconfiguration, or replacement of the damaged tile, ITC Midwest will have no further liability for the identified damaged tile.

The following standards and policies apply to the tile repairs completed by ITC Midwest:

EXAMPLE

ITC Midwest's DEIS Comment Letter

1. Tiles will be repaired with materials of the same or better quality as that which was damaged.

2. If water is flowing through a damaged tile, temporary repairs will be promptly installed and maintained until such time that permanent repairs can be made.

3. Before completing permanent tile repairs in an area where a Landowner, the Agricultural Monitor, or ITC Midwest has identified a potential concern arising from Project construction, tiles will be examined within the work area to check for tile that might have been damaged by construction equipment. If tiles are found to be damaged, they will be repaired so they operate as well after construction as before construction began.

4. ITC Midwest will make efforts to complete permanent tile repairs within a reasonable timeframe after Final Clean-up, taking into account weather and soil conditions.

5. Following completion of the Final Clean-up and damage settlement, ITC Midwest will be responsible for correcting and repairing tile breaks, or other damages to tile systems that are discovered on the Right-of-Way to the extent that such breaks are the result of Project construction. These damages are usually discovered after the first significant rain event. ITC Midwest will provide the Landowner with contact information should tile damage issues be identified after Final Clean-up. ITC Midwest will not be responsible for tile repairs performed by the Landowner.

EXAMPLE

ITC Midwest will be responsible for installing additional tile or other drainage measures, including adding topsoil, as necessary to properly drain wet areas along the Right-of-Way caused by the construction of the Project.

Soil Compaction/Rutting

Compaction will be alleviated as practicable on cropland traversed by construction equipment. ITC Midwest will work with the Landowner to alleviate compaction during suitable weather conditions in a mutually agreeable manner.

ITC Midwest will repair damage incurred due to compaction, ruts, erosion, and/or washing of soil caused by electric line construction. If, by mutual agreement, the Landowner repairs such damage, ITC Midwest will reimburse the Landowner for the reasonable cost of labor and the use of equipment to repair damage incurred due to compaction, ruts, erosion, and/or washing of soil caused by electric line construction. ITC Midwest will make such payments within a reasonable period of time following completion of project construction and after receiving a statement substantiating the Landowner's repair costs.

ITC Midwest will pay for the reasonable cost of repairs to the Landowner's equipment if the equipment is damaged during repair of compaction, ruts, erosion, and/or washing of soil by materials or debris ITC Midwest left on the right of way during construction.

If there is a dispute between the Landowner and ITC Midwest as to what areas need to be ripped or chiseled, the depth at which compacted areas should be ripped or chiseled, or the necessity for, or rates of, lime, fertilizer, and organic material application, ITC Midwest will consult with the Agricultural Monitor prior to making a final decision.

Excess Soil and Rocks
Excess soil and rock will be removed from the site unless otherwise requested by the Landowner. After Final Clean-up and restoration of Agricultural Lands, ITC Midwest will make good faith efforts to obtain written acknowledgement of completion of such activities from the Landowner.

Construction Debris
ITC Midwest will remove construction-related debris and material which is not an integral part of the transmission line from the Landowner's property at ITC Midwest's cost. Such material may include excess construction materials or litter generated by the construction crews.

Procedures for Determination of Damages and Compensation
ITC Midwest will maintain a procedure for processing Landowner claims for construction-related damages, including but not limited to crop damages. The procedure is intended to standardize and minimize Landowner concerns regarding the recovery of damages, to provide a degree of certainty and predictability for Landowner and ITC Midwest, and to foster good relationships among ITC Midwest and Landowner over the long term. A copy of the procedure will be provided to Landowner during Easement acquisition negotiations.

Damage claim negotiations between ITC Midwest and any affected Landowner will be voluntary in nature. ITC Midwest will offer to compensate Landowners according to the terms of ITC Midwest's damage claim policy in effect at the time the Easement is executed and recorded. The compensation offered is only an offer to settle, and the offer shall not be introduced in any proceeding brought by the Landowner to establish the amount of damages ITC Midwest must pay.

Weed Control
When requested, ITC Midwest will work with neighboring Landowner to determine adequate weed control measures on lands owned by ITC Midwest for substation facilities. The intent of such weed control measures is to prevent the spread of weeds

EXAMPLE

onto adjacent Agricultural Land. Any weed control spraying will be in accordance with State of Minnesota regulations.

Soil Conservation Practices
Soil conservation practices such as terraces and grassed waterways which are damaged by the transmission line's construction will be restored to their pre-construction condition as near as possible. ITC Midwest will attempt to work with the Landowner to identify and document the pre-construction conditions of these features.

Irrigation
If the transmission line and/or temporary work areas intersect an operational (or soon to be operational) spray irrigation system, ITC Midwest will work with the Landowner to establish an acceptable amount of time the irrigation system may be out of service.

If, as a result of the transmission line construction activities, an irrigation system interruption results in crop damages either on the Right-of-Way or off the Right-of-Way, compensation to Landowner, as appropriate, will be determined as described in "Procedures for Determination of Damages and Compensation" section of this AIMP.

If it is feasible and mutually acceptable to ITC Midwest and the Landowner, temporary measures will be implemented to allow an irrigation system to continue to operate across land on which the transmission line is also being constructed. ITC Midwest will not allow an irrigation system to continue operation across land on which the transmission line is also being constructed if the ITC Midwest Inspector, land agent, or field supervisor determine that such operation would be unsafe.

Temporary Roads
The location of temporary roads to be used for construction purposes will be discussed with the Landowner.

A. The temporary roads will be designed so as to not impede proper drainage and will be built to mitigate soil erosion on or near the temporary roads.

B. After Final Clean-up, temporary roads may be left intact through mutual agreement of the Landowner and ITC Midwest unless otherwise restricted by Federal, State, or local regulations.

C. If a temporary road is to be removed, the Agricultural Land upon which the temporary road is constructed will be returned to its previous use and restored to equivalent condition as existed prior to construction.

EXAMPLE

ITC Midwest's DEIS Comment Letter

Organic Farms

ITC Midwest recognizes that Organic Agricultural Land is a unique feature of the landscape and will treat this land with a similar level of care as other sensitive environmental features. This section identifies mitigation measures that apply specifically to farms that are Organic Certified or farms that are in active transition to become Organic Certified, and is intended to address the unique management and certification requirements of these operations. This section supplements and is in addition to all other protections provided in this AIMP.

The provisions of this section will only apply to Organic Agricultural Land for which the Landowner has provided to ITC Midwest a true, correct and current version of the Organic System Plan within 60 days after the signing of the Easement or 60 days after the first contact by ITC Midwest after the Commission issues a Route Permit, whichever occurs first.

Organic System Plan

ITC Midwest recognizes the importance of the individualized Organic System Plan to the Organic Certification process. ITC Midwest will work with the Landowner, the Landowner's Certifying Agent, and/or a mutually acceptable third-party Organic consultant to identify site-specific construction practices that will minimize the potential for Decertification as a result of construction activities. Possible practices may include, but are not limited to: equipment cleaning, planting a deep-rooted cover crop in lieu of mechanical decompaction, applications of composted manure or rock phosphate, preventing the introduction of disease vectors from tobacco use, restoration and replacement of beneficial bird and insect habitat, maintenance of organic buffer zones, use of organic seeds for any cover crop, or similar measures. ITC Midwest recognizes that Organic System Plans are proprietary in nature and will respect the need for confidentiality.

Prohibited Substances

ITC Midwest will avoid the application of Prohibited Substances onto Organic Agricultural Land. No herbicides, pesticides, fertilizers or seed will be applied to Organic Agricultural Land unless requested and approved by the Landowner. Likewise, ITC Midwest will avoid refueling, fuel or lubricant storage, or routine equipment maintenance on Organic Agricultural Land. Equipment will be checked prior to entry to make sure that fuel, hydraulic and lubrication systems are in good working order before working on Organic Agricultural Land. If Prohibited Substances are used on land adjacent to Organic Agricultural Land, these substances will be used in such a way as to prevent them from entering Organic Agricultural Land.

EXAMPLE

Temporary Road Impacts
Topsoil and Subsoil layers that are removed during construction on Organic Agricultural Land for temporary road impacts will be stored separately and replaced in the proper sequence after the transmission line is installed. Unless otherwise specified in the site-specific plan described above, ITC Midwest will not use this soil for other purposes, including creating access ramps at road crossings. No Topsoil or Subsoil (other than incidental amounts) may be removed from Organic Agricultural Land. Likewise, Organic Agricultural Land will not be used for storage of soil from non-Organic Agricultural Land.

Erosion Control
On Organic Agricultural Land, ITC Midwest will, to the extent feasible, implement erosion control methods consistent with the Landowner's Organic System Plan. On land adjacent to Organic Agricultural Land, ITC Midwest' erosion control procedures will be designed so that sediment from adjacent non-Organic Agricultural Land will not flow along the Right-of-Way and be deposited on Organic Agricultural Land. Treated lumber, non-organic hay bales, non-approved metal fence posts, etc. will not be used for erosion control on Organic Agricultural Land.

Weed Control
On Organic Agricultural Land, if ITC Midwest determines weed control is necessary during construction activities, ITC Midwest will, to the extent feasible, implement weed control methods consistent with the Landowner's Organic System Plan. Prohibited Substances will not be used for weed control within 50 feet of posted Organic Agricultural Land.

Monitoring
In addition to the responsibilities of the Agricultural Monitor described in the AIMP, the following will apply:

A. The Agricultural Monitor will monitor construction and restoration activities on Organic Agricultural Land for compliance with the provisions of this section and will document any activities that may result in Decertification.

B. Instances of non-compliance will be documented according to Independent Organic Inspectors Association protocol consistent with the Landowner's Organic System Plan, and will be made available to the MDA, the Landowner, the Landowner's Certifying Agent, ITC Midwest Inspector and to ITC Midwest.

If the Agricultural Monitor is responsible for monitoring activities on Organic Agricultural Land, s/he will be trained, at ITC Midwest's expense, in organic inspection, by the Independent Organic Inspectors Association, unless the Agricultural Monitor received such training during the previous three years.

EXAMPLE

Compensation for Construction Damages

The settlement of damages will be based on crop yield and/or crop quality determination and the need for additional restoration measures. ITC Midwest will first work with the Landowner of Organic Agricultural Land to determine crop yield. In the event ITC Midwest and the Landowner of Organic Agricultural Land cannot determine crop yield, at ITC Midwest's expense, a mutually agreed upon professional agronomist will make crop yield determinations, and the MDA Fruit and Vegetable Inspection Unit will make crop quality determinations. If the crop yield and/or crop quality determinations indicate the need for soil testing, the testing will be conducted by a commercial laboratory that is properly certified to conduct the necessary tests and is mutually agreeable to ITC Midwest and the Landowner. Field work for soil testing will be conducted by a professional soil scientist or professional engineer licensed by the State of Minnesota. ITC Midwest will be responsible for the cost of sampling, testing and additional restoration activities, if needed. Additional restoration activities will be completed according to the terms of its damage claim policy in effect at the time the Easement is executed and recorded.

Compensation for Damages Due to Decertification

Should any portion of Organic Agricultural Land be Decertified as a result of construction activities, ITC Midwest will pay damages for crops and/or livestock within the area impacted by the lost Certification equal to the full difference between the market value of conventional crops and/or livestock and the market value of the organic crops and/or livestock lost for three years or the period of time necessary for the Landowner or Tenant to regain Certification, whichever comes first. The market value of the crop will be determined as set forth in the damage claim policy. At the request of ITC Midwest, the Landowner shall provide verification of its loss of organic Certification through the accredited certifying agent prior to any compensation for organic crop loss being paid.

EXAMPLE

Definitions

Agricultural Land	Land that is actively managed for cropland, hayland, or pasture, and land in government set-aside programs.
Agricultural Monitor	Monitor retained and funded by ITC Midwest, reporting directly to the Minnesota Department of Agriculture ("MDA") and responsible for auditing ITC Midwest's compliance with provisions of this AIMP.
Certifying Agent	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.2.
Cropland	Land actively managed for growing row crops, small grains, or hay.
Decertified or Decertification	Loss of Organic Certification.
Easement	The agreement(s) and/or interest in privately owned Agricultural Land held by ITC Midwest by virtue of which it has the right to construct, operate and maintain the transmission line together with such other rights and obligations as may be set forth in such agreement.
Final Clean-up	Transmission line activity that occurs after the power line has been constructed. Final Clean-up activities may include: removal of construction debris, de-compaction of soil as required, installation of permanent erosion control structures, final grading, and restoration of fences and required reseeding. Once Final Clean-up is finished, Landowner will be contacted to settle all damage issues and will be provided a form to sign acknowledging final construction settlement.
Inspector	Full-time on-site inspector retained by ITC Midwest to verify compliance with requirements of this AIMP during construction of the transmission line. The Inspector will have demonstrated experience with transmission line construction on Agricultural Land.
ITC Midwest	ITC Midwest LLC, a Michigan limited liability company. May also include agents and contractors of ITC Midwest, where appropriate.

EXAMPLE

Landowner	Person(s), or their representatives, holding legal title to Agricultural Land on the transmission line route from whom ITC Midwest is seeking, or has obtained, a temporary or permanent Easement. "Landowner" includes Tenant, if any.
Non-Agricultural Land	Any land that is not "Agricultural Land" as defined above.
Organic Agricultural Land	Farms or portions thereof described in 7 CFR Parts 205.100, 205.202, and 205.101.
Organic Buffer Zone	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.2.
Organic Certification or Organic Certified	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.100 and 7 CFR Part 205.101.
Organic System Plan	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.2.
Prohibited Substance	As defined by the National Organic Program Standards, Federal Regulations 7 CFR Part 205.600 through 7 CFR 205.605 using the criteria provided in 7 USC 6517 and 7 USC 6518.
Right-of-Way	The Agricultural Land included in permanent and temporary Easements which ITC Midwest acquires for the purpose of constructing, operating and maintaining the transmission line.
Subsoil	Soil that is not Topsoil, and located immediately below Topsoil.
Tenant	Any Person(s) lawfully renting or sharing land for agricultural production which makes up the "Right-of-Way" as defined in this AIMP.
Tile	Artificial subsurface drainage system.
Topsoil	The uppermost horizon (layer) of the soil, typically with the darkest color and highest content of organic matter.

EXAMPLE

Appendix P

Cultural Resources Consultation and Report

RECEIVED
AUG 13 2014

Minnesota
Historical Society
STATE HISTORIC PRESERVATION OFFICE

Using the Power of History to Transform Lives
PRESERVING › SHARING › CONNECTING

RECEIVED
AUG 25 2014
BY: BR

August 11, 2014

Julie Ann Smith PhD
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
Washington, DC 20585

RE: Proposed Great Northern Transmission Line (DOE/EIS-0499)
Multiple Counties, Minnesota
SHPO Number: 2013-2759

Dear Dr. Smith.

On 8 July 2014, our office received notification regarding the initiation of the process of environmental analysis under the National Environmental Policy Act (NEPA) which will culminate in preparation of an Environmental Impact Statement (EIS) for the Great Northern Transmission Line, which is proposed to be constructed from Roseau County to Itasca County in Minnesota.

While our office often participates in project environmental review under NEPA, it is typically coordinated, or concurrent with consultation pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 (NHPA) and implementing federal regulations at 36 CFR 800. We request that you provide clarification regarding the DOE's anticipated plan for compliance with Section 106 in coordination with NEPA, as outlined in 36 CFR 800.8.

Your letter indicates that the St. Paul District, U.S. Army Corps of Engineers will be a cooperating agency for this proposed project. They have not yet initiated consultation with our office on this undertaking.

We look forward to continuing consultation on this important project. Please feel free to contact me if you have any questions or concerns regarding this letter. I can be reached at 651-259-3456 or sarah.beimers@mnhs.org.

Sincerely,

Sarah J. Beimers

Sarah J. Beimers, Manager
Government Programs and Compliance

cc: Tamara Cameron, St. Paul District, USACE
Jamie Loichinger, Advisory Council on Historic Preservation

Minnesota Historical Society, 345 Kellogg Boulevard West, Saint Paul, Minnesota 55102
651-259-3000 • 888-727-8386 • www.mnhs.org

Department of Energy
Washington, DC 20585

November 19, 2014

Mr. Stephen Elliot
State Historic Preservation Officer
Minnesota Historical Society
345 Kellogg Boulevard West
St. Paul, MN 55102-1906

SUBJECT: Initiation Request for Section 106 Consultation under the National Historic Preservation Act (NHPA) for the proposed *Great Northern Transmission Line Project* (DOE/EIS-0499)

Dear Mr. Elliot:

The U.S. Department of Energy (DOE or the Department) is in the process of preparing its draft Environmental Impact Statement (EIS) for the proposed Great Northern Transmission Line (GNTL) project in Roseau, Lake of the Woods, Koochiching, and Itasca Counties in northern Minnesota. DOE is preparing its draft EIS pursuant to its obligations under the National Environmental Policy Act (NEPA) to evaluate environmental impacts of providing a Presidential permit to Minnesota Power for the construction, operation, maintenance, and connection of the portion of the transmission line within the United States. The proposed DOE federal action is the potential grant of a Presidential permit for the international border crossing requested by Minnesota Power as part of its proposal. This action has been determined by DOE to be an undertaking that has potential to cause adverse effects on historic properties per the Advisory Council on Historic Preservation's (ACHP's) NHPA implementing regulations at 36 CFR §800.3(a).

The Department is coordinating its compliance with Section 106 of the NHPA with its review under NEPA according to the process set out in 36 CFR §800.3(b). Per standing policy, DOE will explicitly solicit information from the public (via the NEPA process) regarding cultural and historic resources through its Notice of Availability of its draft EIS when published in the *Federal Register*. DOE will also make cultural resources reports and information publicly available on the GNTL project EIS website, as appropriate.

In this letter DOE provides you with a summary of the actions that the Department is taking to comply with Section 106 of the NHPA, including project background, efforts to identify historic properties potentially affected by the proposed GNTL project to date, a preliminary list of potentially affected historic properties listed or eligible for listing on the National Register of Historic Properties (NRHP), potential consulting parties. This letter also discusses DOE's initial proposal for direct and indirect Areas of Potential Effect (APEs) to be used in the Department's proposed phased approach to identification and evaluation of historic resources under Section 106. Furthermore, DOE is sending this letter as its official request for initiation of Section 106 consultation under NHPA with the Minnesota State

Historic Preservation Office (SHPO), and would appreciate your written reply within 30-days or as soon as possible.

Background

As you are aware, DOE sent a NEPA review information letter to your office on July 10, 2014, indicating that Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. The U.S. Army Corps of Engineers, St. Paul District (USACE), the U.S. Fish and Wildlife Service, and the U.S. Environmental Protection Agency, Region 5, will be cooperating agencies to DOE and DOC-EERA in the preparation of this EIS.

DOE is the lead federal agency for purposes of compliance with Section 106, in accordance with 36 CFR § 800.2(a)(2), and will address the potential effects of the above identified NEPA cooperating agencies' (namely USACE's) proposed actions on historic and archaeological resources.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. The NOI specifically indicated that cultural and historic resources are being analyzed as part of the federal environmental review. While the proposed federal action (and undertaking) is the potential grant of a Presidential permit by DOE for the international border crossing, the proposed construction, operation, maintenance, and connection of the portion of the transmission line within the United States is a connected action to DOE's proposed action under NEPA. DOE is therefore analyzing the potential environmental impacts from the proposed federal action and the connected action in the EIS. For the purposes of compliance with Section 106 of the NHPA, DOE is considering the potential for adverse effects to cultural and historic properties for the proposed border crossing and entire length of the proposed transmission line.

Consulting Parties

In accordance with 36 CFR §800.2, DOE has identified potential consulting parties, including ACHP, SHPO, THPOs, the Applicant, local government representatives, other Native American entities, local historical societies, heritage preservation commissions, state

agencies, sites and museums, state-wide groups, national groups, and private individuals with a for the purposes of Section 106 consultation under NHPA. A list of consulting parties identified by DOE is enclosed with this letter for your review and input (*see enclosed Draft List of GNTL Section 106 Consulting Parties)*. DOE requests that you and your staff provide the Department with feedback regarding any other potential Section 106 consulting parties for the GNTL project that may not have yet been identified or that should be included in this list of potential consulting parties. Your office's assistance in this matter at this time is greatly appreciated.

Tribal Outreach and Consultation

As proposed, the GNTL project does not directly involve tribal reservation lands or require a right-of-way grant or special use grant from tribes, however, the proposal is located in an area that was inhabited by numerous American Indians before Euro-American settlement. As a result the proposal has the potential to impact tribes with current or historic interest in the project area.

In accordance with its responsibilities under Section 106, NEPA, the American Indian Religious Freedom Act (16 U.S.C. 1996), the Archeological Resources Protection Act of 1979 (16 U.S.C. 470aa-mm), the Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3001, et. seq.), Executive Order 13175 *Consultation and Coordination with Indian Tribal Governments*, (November 6, 2000), and DOE's "American Indian and Alaska Native Tribal Government Policy," as set forth in DOE Order 1230.2 (October 2000), DOE initiated government-to-government consultation with tribes potentially affected by the proposed GNTL project via letter dated June 27, 2014. As a part of this effort, DOE held government-to-government tribal consultation meetings on July 15, 2014, in Red Lake, Minnesota, and on July 22, 2014, in Deer River, Minnesota. The purpose of these initial consultation meetings was to gain the opinions of tribes regarding the cultural values that tribes ascribe to the area and its resources, as well as to identify opinions of tribes that no longer live in the area.

A list of federally recognized American Indians and Tribal Historic Preservation Officers (THPOs) contacted by DOE as a part of these activities is provided in the attached *Draft List of GNTL Section 106 Consulting Parties*. DOE's government-to-government consultation activities with these tribes and THPOs are on-going.

Identification Efforts to Date

The proposed undertaking has the potential to affect historic properties either listed in, or eligible for, inclusion in the National Register of Historic Places. An initial cultural resources survey (i.e., desktop literature review) was performed by Minnesota Power as part of the GNTL project Presidential permit application to DOE. This survey considered a study area extending 1-mile on each side of the proposed GNTL Project's right-of-way (ROW) centerline, with preliminary potential direct effects analysis based on an anticipated 200-foot-wide ROW within 1000-3000 foot Route Alternatives.

The initial cultural resources survey study area encompassed two Route Alternatives and four (4) Segment Options. The Route Alternatives are the Blue Route and the Orange Routes. Segment Options include the Segment Option C1, Segment Option C2, Segment Option J1, and Segment Option J2 (*see enclosed Cultural Resources Study).*

As a part of this effort, your office responded to historic resources data (e.g., GIS shape files) requests by Minnesota Power in March 2013, July 2013, August 2013, and November 2013. Your office also provided input to Minnesota Power regarding the proposed GNTL project and suggestions for archaeological survey via a letter dated August 14, 2013.

An initial study of the NHRP listed or eligible properties found that one of the properties identified within 1-mile of the Blue Route is listed on the NRHP, however, four properties, all railroad or mining properties, are considered eligible for NRHP listing: the Great Northern Railway Gunn Line (IC-IRT-009), one segment of the Duluth, Missabi and Northern Railway (IC-IRT-010), the Holman Mine Stripping and Lean Ore Dump (IC-IRT-012), and the Brown Number 2 Mine Stripping Dump (IC-IRT-013).

The study also found that no properties identified within 1-mile of the Orange Route are listed on the NRHP, however, four properties, all railroad or mining properties, are considered eligible for NRHP listing: the Great Northern Railway Gunn Line (IC-IRT-009), one segment of the Duluth, Missabe and Northern Railway (IC-IRT-010), the Holman Mine Stripping and Lean Ore Dump (IC-IRT-012), and the Brown Number 2 Mine Stripping Dump (IC-IRT-013).

For the Segment Options C1, C2, and J1, this study indicated that there are no NRHP listed or eligible properties within the CR Study Area. While none of the properties identified within the Segment Option J2 CR Study Area are listed on the NRHP, two architectural properties within the CR Study Area have been evaluated as eligible for listing on the NRHP: two segments of Minnesota Highway 38 (IC-BFT-017 and IC-EFC- 015).

The GNTL Presidential permit application, including associated maps, drawings, and initial cultural resources study, can also be viewed or downloaded in its entirety from the DOE Office of Electricity Delivery and Energy Reliability (OE) program Web site at: http://energy.gov/oe/downloads/application-presidential-permit-oe-docket-no-pp-398-great-northern-transmission-line. However, I have attached "Appendix G- Cultural Resources Study" submitted as part of Minnesota Power's Presidential permit application to this letter for your use and review.

In addition to efforts by Minnesota Power to identify historic resources potentially affected by the proposed GNTL project, DOE held eight NEPA public scoping meetings during its 45-day public scoping comment period from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. The meetings held in the towns of Roseau, Baudette, Littlefork, International Falls, Kelliher, Bigfork, and Grand Rapids, Minnesota. DOE received four comments related to potential impacts from construction on historic resources along the proposed transmission routes, including such resources as the Conservation Corps Camp 53 site, historic logging sites, and Big Fork River historic and cultural areas. The *Great Northern Transmission Line Scoping Summary Report* (November 2014) is available on the DOE GNTL EIS Web site at: http://www.greatnortherneis.org/Files/ScopingSummaryReportNOV2014.pdf. Due to its overall size, a hardcopy of this report will be provided to you upon request in follow up to this letter.

Scope of Future Identification Efforts under Section 106–Area of Potential Effect (APE)

As mentioned above, the anticipated ROW for the proposed GNTL project is 200-foot-wide alignment located within a 1000-3000 foot-wide route alternative. In order to begin your consideration of DOE's scope of identification efforts under Section 106 of the NHPA, the Department proposes a direct APE of the maximum width of a route alternative, an area of approximately 1000-3000 feet wide for each proposed Route Alternative. Using this as an initial point for scope of identification efforts (e.g., Phase 1A survey efforts) would allow for flexibility in siting of the final alignment within the approved route alternative. Once the final alignment is determined by the Minnesota Public Utilities Commission, DOE would propose a direct APE as the 200-foot wide alignment for detailed identification and evaluation efforts. The direct APE for identifying terrestrial historic properties and below grade archeological resources would include those areas outside of the ROW that may be impacted by construction, access roads, material and equipment storage areas, or any other physical disturbances necessary during construction of the project.

At this time, DOE would also like SHPO to contemplate the extent of an indirect APE for assessing the potential for adverse visual effects of the proposed GNTL project on terrestrial historic properties. The Department typically proposes an indirect APE for overhead transmission lines of this size and complexity to be approximately one-mile on either side of the center line (will vary with topography) of the proposed right-of-way once the final alignment is established. DOE looks forward to future discussions with you and other consulting parties about these proposed direct and indirect APEs for the GNTL project, and understands that no final direct and indirect APE determinations may be made at this time.

DOE Identification of Historic Properties – Programmatic Agreement (PA)

Because DOE is currently considering alternatives under NEPA for the proposed GNTL project that are large linear tracts of land encompassed in Minnesota Power's proposed Blue and Orange Route Alternatives and four Route Segment Options (C1, C2, J1, and J2), DOE has determined that a phased approach for Section 106 identification and evaluation efforts in accordance with the process set forth in 36 CFR §800.4(b)(2) is appropriate. The Department therefore proposes the execution of a programmatic agreement (PA) pursuant to 36 CFR §800.14(b) to properly defer final identification and evaluation of historic properties. A programmatic agreement for the GNTL project would delineate the process by which the likely presence of historic properties within the APE for each alternative under consideration through background research, consultation, and appropriate level of field investigation is performed, while taking into consideration the magnitude of the undertaking and its likely effects, and the views of SHPO, THPO(s) and any other consulting.

DOE has attached a preliminary draft PA for the GNTL project to this letter for your review and consideration. This preliminary draft PA is offered as a starting point for Section 106 consultation discussions with SHPO and consulting parties in considering DOE's proposed phased approach to identification and evaluation of historic and cultural properties potentially affected by the proposed GNTL project (*see enclosed Preliminary Draft PA).*

In close, DOE currently seeks your concurrence on initiating its Section 106 consultation process for the proposed Great Northern Transmission Line project. DOE also seeks any

information or suggestions that your office may have with regard to potential consulting parties or tribes that are included in the attached consulting parties list, or if you have additional information that should considered at this time. Please provide your Section 106 initiation concurrence and any material information that you may have in writing so that it may be added to the administrative record to evidence DOE's compliance with Section 106 consultation responsibilities.

I very much look forward to working with you and your staff in the near future and appreciate your assistance in this effort. I will be traveling on GNTL project business to St. Paul from December 2-4, 2014, and would like to have an opportunity to introduce myself in person to you and your staff. I hope there will be time in your schedule and staff resources for this meeting to occur, and will be in contact with your staff via email and/or phone in an effort to schedule such an opportunity if possible.

If you have any questions or concerns, please contact me at any time at Juliea.Smith@hq.doe.gov or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from NEPA Scoping Summary Report)
- Cultural Resources Study (Appendix G from DOE Presidential permit application)
- Draft List GNTL Section 106 Consulting Parties
- Preliminary Draft PA

Cc: Charlene Dwin Vaughn, Advisory Council on Historic Preservation

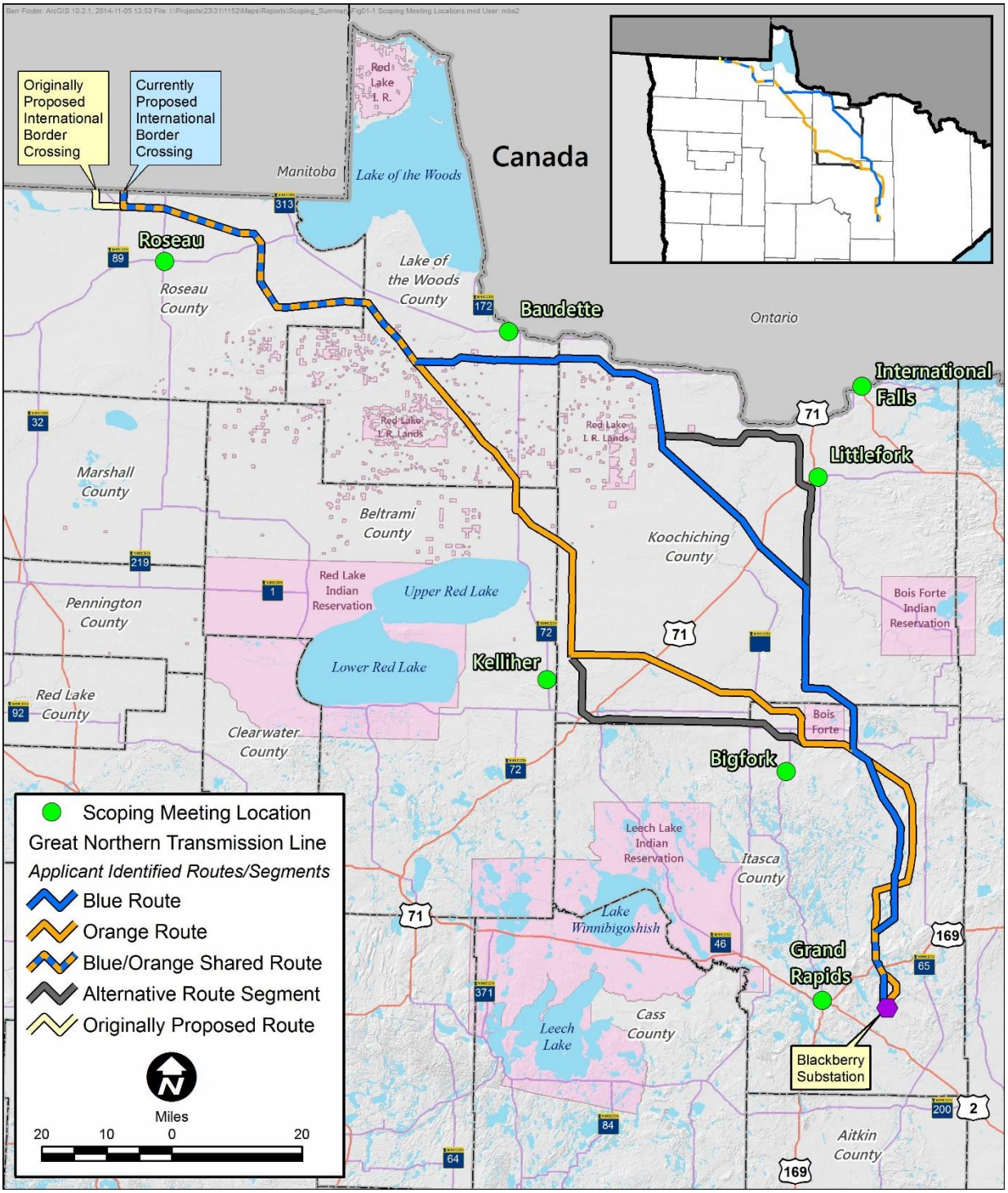


Figure 1-1 Project Regional Map

List of Great Northern Transmission Line Project
Section 106 Consulting Parties

Federal Agencies

- Department of Energy *(Lead Section 106 Federal Agency*)
- US Army Corps of Engineers – St. Paul District/Bemidji Field Office
- US Fish and Wildlife Service – Twin Cities Ecological Field Office (Region 3)
- US Environmental Protection Agency (Region 5)
- Advisory Council on Historic Preservation

National Groups/Entities (not Federal agencies)

- National Trust for Historic Preservation

State Agencies

- Minnesota State Historic Preservation Office
- Minnesota Department of Commerce – Energy Environmental Review and Analysis

Statewide Groups/Entities (not State agencies)

- Preservation Alliance of Minnesota

Representatives of Local Governments

Beltrami County

- Territory of Upper Red Lake
- Township of Waskish (Chairman)

Itasca County

- City of Effie (Mayor)
- City of Taconite (Mayor)
- Township of Ardenhurst (Township Supervisor)
- Township of Balsam (Township Supervisor)
- Township of Bigfork (Township Supervisor)
- Township of Carpenter (Township Supervisor B)
- Territory of Effie
- Township of Grattan (Township Supervisor)
- Township of Greenway (Township Supervisor)
- Township of Iron Range
- Township of Lawrence (Supervisor A)
- Township of Liberty
- Territory of Little Sand Lake
- Township of Nashwauk (Supervisor B)
- Township of Nore (Supervisor A)
- Territory of Northeast Itasca
- Township of Pomroy (Supervisor A)
- Township of Trout Lake (Supervisor)

Koochiching County

- City of Northome (Mayor)
- Territory of East Koochiching
- Territory of Northome

Koochiching County (continued)

- Territory of Northwest Koochiching
- Territory of Rainy Lake
- Territory of South Koochiching

Lake of the Woods County

- Territory of Beltrami Forest
- Territory of Rainy River

Roseau County

- Township of Cedarbend (Township Chairman)
- Township of Dieter (Township Chairman)
- Township of Jadis (Township Chairman)
- Township of Lake (Township Chairman)
- Territory of North Roseau
- Township of Pohlitz (Township Chairman)
- Territory of Southeast Roseau

Applicant

- Minnesota Power

Local Historic Societies/Agencies

- Beltrami County Historical Society (President)
- Itasca County Historical Society (Executive Director)
- Koochiching Museums/Koochiching County Historical Society (Executive Director)
- Lake of the Woods County Historical Society (Executive Director)
- Roseau County Historical Society (Director)
- Saum School Museum
- Warroad Historical Society/Heritage Center (President)
- Northeast Minnesota Historical Center Collections (UMD Archivist/Special Collections Curator)
- Iron Range Research Center (IRRC) (Archivist)

Tribal Groups

- The Great Lakes Indian Fish and Wildlife Commission
- Midwest Alliance of Sovereign Tribes
- The Midwest Treaty Network
- Native American Fish & Wildlife Society

Individuals/Presidential permit Intervenors (non-NEPA) per the DOE Presidential permit regulations at 10 CFR Part 250

- Curtis Erickson
- Richard Libby
- Carol Overland
- Robert Oveson

Federally Recognized American Indian Tribes/THPOs contacted by DOE

A.T. Rusty	Stafne	Chairperson	Assiniboine and Sioux Tribes of the Fort Peck Reservation
Darrell "Curley"	Youpee	Cultural Resources Department Director	Assiniboine and Sioux Tribes of the Fort Peck Reservation
Edith	Leoso	THPO	Bad River Band of the Lake Superior Tribe of Chippewa Indians
Mike	Wiggins	Chairperson	Bad River Band of the Lake Superior Tribe of Chippewa Indians
Rosemary	Berens	THPO	Bois Forte Band of Chippewa Indians
Kevin	Leecy	Chairperson	Bois Forte Band of Chippewa Indians
Dave	Larson		Bois Forte Tribal Government-Nett Lake
Kevin	Keckler	Chairperson	Cheyenne River Sioux Tribe
Steve	Vance	THPO	Cheyenne River Sioux Tribe
Duane	Big Eagle Sr.	Chairperson	Crow Creek Sioux Tribe of the Crow Creek Reservation
Anthony	Rider	President	Flandreau Santee Sioux Tribe of South Dakota
James	Weston	THPO	Flandreau Santee Sioux Tribe of South Dakota
Sean	Copeland		Fond du Lac Band of Lake Superior Chippewa
LeRoy	Defoe	THPO	Fond du Lac Band of Lake Superior Chippewa
Karen	Diver	Chairperson	Fond du Lac Band of Lake Superior Chippewa
Melissa	Cook	THPO	Forest County Potawatomi Community WI
Harold	Frank	Chairperson	Forest County Potawatomi Community WI
Victoria	Raske	THPO	Grand Portage Band of Lake Superior Chippewa
Kenneth	Meshiguad	Chairperson	Hannahville Indian Community Michigan
Warren	Schwartz Jr.	President	Keweenaw Bay Indian Community Michigan
Louis	Taylor	Chairperson	Lac Courte Orilles Band of Lake Superior Chippewa Indians of Wisconsin
Thomas	Maulson	President	Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambe
Melinda	Young	THPO	Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambe
James	Williams Jr.	Chairperson	Lac Vieux Desert Band of Lake Superior Chippewa Indians Michigan
Gina	Lemon	THPO (acting)	Leech Lake Band of Ojibwe
Aurthur	LaRose	Chairperson	Leech Lake Band of the Minnesota Chippewa Tribe MN

Federally Recognized American Indian Tribes/THPOs contacted by DOE

Carri	Jones	Chairwoman	Leech Lake Band of Ojibwe
Robbie M.	Howe-Bebeau	Representative	Leech Lake Reservation
Arthur	Rose	Chairman	Leech Lake Reservation
Steve	White	Representative	Leech Lake Reservation
Eugene	Whitebird	Representative	Leech Lake Reservation
Michael	Jandreau	Chairperson	Lower Brule Sioux Tribe of the Lower Brule Reservation
Anthony	Morse	THPO	Lower Sioux Indian Community MN
Denny	Prescott	President	Lower Sioux Indian Community MN
Natalie	Weyaus	THPO	Mille Lacs Band of Ojibwe MN
Melanie	Benjamin	Chief Executive	Mille Lacs Band of Ojibwe MN
Norman	Deschampe	President	Minnesota Chippewa Tribe MN
Wilmer	Mesteth	THPO	Oglala Sioux Tribal Council of the Pine Ridge Reservation
John	Yellow Bird-Steele	President	Oglala Sioux Tribal Council of the Pine Ridge Reservation
Audrey	Bennett	NAGPA	Prairie Island Indian Community in the State of Minnesota
Whitney	White	Cultural Resource Representative	Prairie Island Indian Community in the State of Minnesota
Victoria	Winfrey	President	Prairie Island Indian Community in the State of Minnesota
Larry	Balber	THPO	Red Cliff Band of Lake Superior Chippewa Indians WI
Kathryn	Beauleiu	NAGPRA	Red Lake Band of Chippewa Indians Minnesota
Floyd	Jourdain	Chairperson	Red Lake Band of Chippewa Indians Minnesota
Rodney	Bordeaux	President	Rosebud Sioux Tribe of the Rosebud Indian Reservation
Russell	Eagle Bear	THPO	Rosebud Sioux Tribe of the Rosebud Indian Reservation
Richard	Thomas	THPO	Santee Sioux of Nebraska
Roger	Trudell	Chairman/ Leader	Santee Sioux of Nebraska
Stanely	Crooks	Chairperson	Shakopee Mdewakanton Sioux Community MN
Diane	Desrosier	THPO	Sisseton- Wahpeton Oyate of the Lake Traverse Reservation
Robert	Shepherd	Chairperson	Sisseton- Wahpeton Oyate of the Lake Traverse Reservation
Garland	McGeshick	Chairperson	Sokaogon Chippewa Community WI
Myra	Pearson	Chairperson	Spirit Lake Tribe North Dakota

Federally Recognized American Indian Tribes/THPOs contacted by DOE

Darrell	Smith	Cultural Resource Program Manager	Spirit Lake Tribe North Dakota
Waste'Win	Young	THPO	Standing Rock Sioux Tribe
Charles	Murphy	Chairperson	Standing Rock Sioux Tribe
Elgin	Crows Breast	THPO	Three Affiliated Tribes of the Fort Berthold Reservation
Tex "Red Tipped Arrow""""	Hall	Chairman	Three Affiliated Tribes of the Fort Berthold Reservation
Kade	Ferris	THPO	Turtle Mountain Band of Chippewa
Merle	St. Clair	Chairperson	Turtle Mountain Band of Chippewa
Kevin	Jensvold	Chairperson	Upper Sioux Community of Minnesota
Marlow	LaBatte	THPO	Upper Sioux Community of Minnesota
Dennis	Gill		Wahpekute Band of Dakota
Tom	McCauley	THPO	White Earth Band of MN Chippewa Tribe MN
Erma	Vizenor	Chairperson	White Earth Band of MN Chippewa Tribe MN
Lana	Gravatt	THPO	Yankton Sioux Tribe

Phase Ia Cultural Resources Investigations for the Proposed Great Northern Transmission Line, Roseau, Lake of the Woods, Beltrami, Koochiching, and Itasca Counties, Minnesota

Submitted to
Louise Segroves
Barr Engineering
Minneapolis, Minnesota

Prepared by
Amanda Gronhovd, MS, RPA
10,000 Lakes Archaeology, Inc.
South St. Paul, Minnesota

March 26, 2015

Table of Contents

Figures i
Tables i
Introduction 2
Cultural History 2
Paleoindian Tradition (12,000 to 8,000 Before Present [B.P.]) 2
Archaic Tradition (8,000 to 2,800 B.P.) 3
Woodland Tradition (2,800 B.P. to European Contact) 4
Contact/Postcontact Period (1630 to Present) 4
Recorded Cultural Resources in the Vicinity of the Proposed Project 6
Evaluations, Conclusions, and Recommendations 10
Bibliography 12
Appendix A: Maps 13

Figures

Figure 1. Paleoindian projectile points (Eddins n.d.). 3
Figure 2. Woodland ceramic pots (MVAC n.d.). 4
Figure 3. Father Hennepin at St. Anthony Falls (Minnesota Historical Society 1903) 5
Figure 4. Logging at St. Anthony Falls (Minnesota Historical Society 1870). 6

Tables

Table 1. Archaeological sites located within 1 mile of the proposed project area. 7
Table 2. Historic sites located within 1 mile of the proposed project area. 8

Introduction

10,000 Lakes Archaeology, Inc. (10,000 Lakes) conducted Phase Ia background research for the proposed Great Northern Transmission Line in February and March 2015. The project extends from the United States - Canada border in Roseau County to east of Grand Rapids, Itasca County, Minnesota. The proposed project extends through Roseau, Lake of the Woods, Beltrami, Koochiching, and Itasca Counties. The project area was examined for recorded archaeological or historic sites and areas with a moderate to high potential for containing unrecorded archaeological sites. The archaeological and historic site files and maps were examined at the Minnesota Historical Society, State Historic Preservation Office, and Office of the State Archaeologist.

Cultural History

The Minnesota State Historic Preservation Office (SHPO) has developed several historic contexts for the state of Minnesota and the Upper Midwest. These contexts examine Minnesota's recent (historic) and distant (precontact) past and are based on decades of archaeological and historic research. They are designed to help generally describe and interpret the history of the state and give basic insight into the prevailing theories pertaining to the precontact and historic communities existing in specific locations and at discrete points of time.

The cultural histories focusing solely on American Indian communities are divided into three major traditions: Paleoindian, Archaic, and Woodland. These traditions are defined on the basis of significant changes in how American Indian communities lived. The cultural histories that integrate American Indian and Euroamerican history are generally divided into the Contact and Post-Contact Periods. These contexts range from the first contact between Europeans and American Indians during European exploration in the region, through Euroamerican settlement of traditionally American Indian lands.

Paleoindian Tradition (12,000 to 8,000 Before Present [B.P.])

The Paleoindian Tradition refers to the period of time at the close of the Pleistocene and into the Holocene when American Indian communities were small, mobile, and focused on hunting. Archaeological evidence from Paleoindian sites throughout the central United States and Canada indicates that these communities hunted a limited number of large animals in a variety of environmental settings. As the Pleistocene ended and the Holocene began, the megafauna (e.g., mammoth) gradually died out. This caused the Paleoindian people to shift their focus to primarily hunting the largest remaining species, bison. In addition to bison, it is likely that gathering wild plant foods and hunting smaller animals also contributed significantly to the diet of the Paleoindian people.

The distinctive stone tools made by the Paleoindians included large lanceolate projectile points, which changed through time (Figure 1). The projectile points that were made by the early Paleoindians are often fluted, meaning a channel was created from the base

running up the middle of the point (see Clovis and Folsom in Figure 3), as opposed to those made later which were not (see Plainview in Figure 4). Because Paleoindian communities were very small and nomadic, archaeologists have found only sparse, scattered evidence of the Paleoindian people.

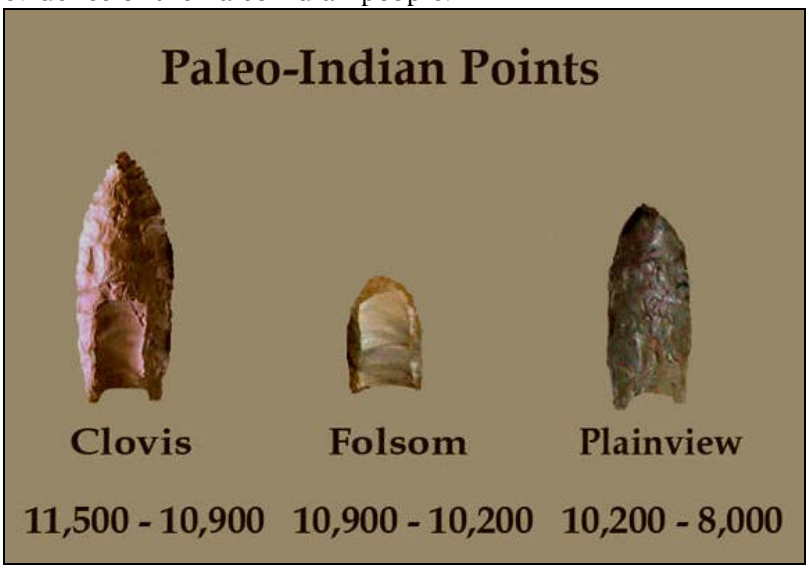


Figure 1. Paleoindian projectile points (Eddins n.d.).

Archaic Tradition (8,000 to 2,800 B.P.)

Shifts in diet and settlement patterns define the transition to the Archaic Tradition. During this period, archaeological evidence suggests that native people were adapting to environmental changes by using more diverse plant and animal resources, and creating and using a broader range of tools including new projectile point forms, atlatls (spear thrower that allowed spears to be thrown farther and with more force), copper tools and ground and pecked stone tools. Although some research suggests that community size increased during the Archaic period, other archaeological evidence counters that assumption, suggesting that community sizes remained small and that day-to-day activities took place at a series of seasonal camps (Anfinson 1987; 1997).

During this period, Archaic people began developing regional differences within their material culture. In Minnesota, this variation appears to have been tied to the natural environment, specifically the plant communities. These variations focused on the "Plains Archaic" in the western prairies, "Eastern Archaic" in the deciduous forest, "Lake-Forest Archaic" in the transitional zone between the deciduous and boreal forest areas, and the "Shield Archaic" in the boreal forest areas of the northeast. As with Paleoindian sites, Archaic sites are relatively small and ephemeral.

Woodland Tradition (2,800 B.P. to European Contact)

Throughout the Midwest, the Woodland Tradition is generally divided into three periods: Early, Middle and Late; however, Anfinson (1987) has suggested that a division into Initial and Terminal periods might be more appropriate in Minnesota. Archaeological research indicates that in many ways, life for communities during the Woodland Tradition remained similar to those of the Archaic period, with a dependence upon a diverse, seasonal resource base of plants and animals (Anfinson 1987:222; Johnson 1988). The transition to the Initial Woodland Tradition occurred when American Indians began manufacturing ceramic vessels, using bows and arrows, constructing earthen burial mounds, and cultivating and harvesting select plant species. The adoption of ceramics by the Woodland American Indians might have caused significant changes in many aspects of this culture, the foremost being subsistence strategies (Boszhardt et al. 1986:258) (Figure 2).

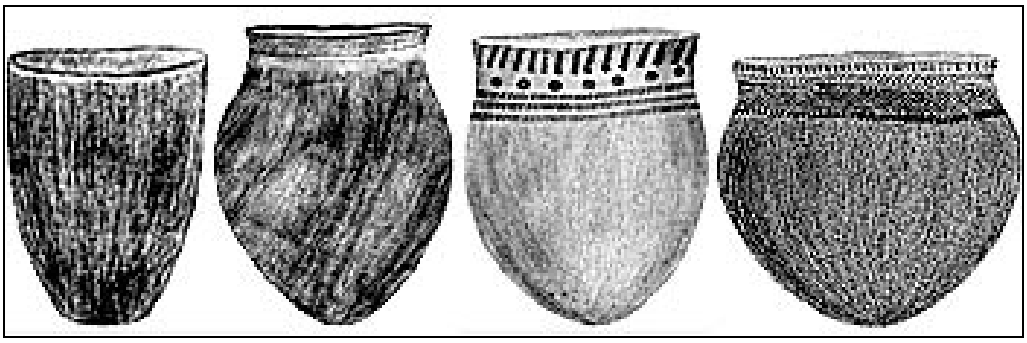


Figure 2. Woodland ceramic pots (MVAC n.d.).

Populations began to grow, marking the transition into the Late or Terminal Woodland period. Settlement patterns shift to larger, more permanent villages typically located near rivers. One possible reason for this is that toward the end of Woodland Period, American Indians became increasingly efficient in how they acquired food. The subsistence strategies of these people incorporated hunting and gathering with limited agriculture focusing on specific plants. Ceramic vessels differed from previous types in form and decoration. Woodland period communities were situated in locations that ranged from focusing on a specific resource to general environments capable of sustaining a large community for a long time.

Site types assigned to the Woodland Tradition throughout the region range from cemeteries and small, limited use sites to extensive village and habitation sites.

Contact/Postcontact Period (1630 to Present)

This period generally refers to the span of time extending from the first European explorations until intensive Euroamerican settlement of the region. Minnesota's historical period began in 1673 when French explorers Marquette and Joliet discovered the upper portion of the Mississippi River. Ten years later, Catholic Missionary Father Louis

Hennepin returned to France to write the first book about Minnesota, *Description de la Louisiane*, telling his story of exploring Minnesota and of being held captive by the Dakota Indians (Figure 3).

Figure 3. Father Hennepin at St. Anthony Falls (Minnesota Historical Society 1903)

The territory containing modern-day Minnesota was claimed by Spain, France, Great Britain, and eventually the United States. Lieutenant Zebulon Montgomery Pike led the first United States expedition through Minnesota in 1805. Fort St. Anthony (later Ft. Snelling) was completed between 1819 and 1824, and in 1836, the Wisconsin Territory, including a portion of Minnesota, was formed. Minnesota became a territory in 1849 and achieved statehood on May 11, 1858. The fur trade drove much of the European exploration and settlement in Minnesota through the mid-1800s.

As white settlers came to Minnesota, the state's economy and numerous industries began developing. One of the earliest industries to peak in Minnesota was the lumber industry (Figure 4). The extensive white pine forests of northern Minnesota brought industrialists, capital, and settlers to the state. Lumbering peaked between 1899 and 1905 and eventually the loggers moved out of Minnesota as the forests were obliterated.

Figure 4. Logging at St. Anthony Falls (Minnesota Historical Society 1870).

Agriculture, specifically wheat farming, was also a key industry in Minnesota. The huge wheat farms in central western and southern Minnesota caused mills to spring up along waterways across the state. The most notable milling center was Minneapolis, which ultimately dominated the world in wheat and flour processing until the 1930s.

In addition to lumber and milling, Minnesota was also a leader in iron mining. Looking at the industries and economy of northeastern Minnesota today, one might have difficulty imagining the area prior to the iron ore industry. Mining and the iron industry created the towns, built the roads, and brought the people to the heavily wooded and remote northeastern Minnesota of the late 19th century. Iron ore shipments were sent from Michigan's Upper Peninsula nearly three decades earlier, but once the Minnesota iron lodes were discovered, the state quickly established a dominant position atop the iron ore production hierarchy.

Associated archaeological and historic site types categorized in the Contact/Postcontact Period include standing structures as well as archaeological sites.

Recorded Cultural Resources in the Vicinity of the Proposed Project

During the background research, *10,000 Lakes* examined the Minnesota Archaeological Site Files at the Office of the State Archaeologist (OSA) and SHPO, and Minnesota Architectural History Site Files at SHPO. This research revealed that 34 archaeological sites

have been recorded within one mile of the proposed project, nine of which are within 1,000 feet or less of the project centerline (Table 1). Five (21KCo, 21ROaa, 21ROao, 21Rod, and 21ROs) are in or adjacent to the project corridor.

Table 1. Archaeological sites located within 1 mile of the proposed project area.

Distance from EIS Align. (FEET)	**Label**	**Site Type**	**Site description**
3511.7	21IC0092	Precontact	Lithic scatter
3044.8	21IC0093	Precontact	Lithic scatter
948.5	21IC0095	Precontact	Utilized flake
2052.5	21IC0096	Precontact	Lithic scatter
3875.7	21IC0099	Precontact	Single artifact
4926.1	21IC0274	Precontact	
1124.7	21ICaju	Historic	Logging camp
4691.2	21KC0062	Precontact	Lithic scatter
1936.1	21KC0072	Precontact	Single artifact
341.5	21KCc	Precontact	Possible mounds
0.0	21KCo	Precontact	Artifact scatter
3924.7	21RO0002	Precontact	Lithic scatter
1675.2	21RO0004	Precontact	Artifact scatter, cemetery
5133.0	21RO0005	Precontact	
1382.6	21RO0006	Precontact	Points and hammerstone
2588.2	21RO0014	Precontact	Cord-marked ceramics, artifact scatter, Cemetery
4946.5	21RO0016	Precontact	Lithic scatter, structural ruin
1092.3	21RO0018	Precontact	Lithics, hammerstone, fire cracked rock
2042.1	21RO0021	Precontact	Artifact scatter
4015.4	21RO0024	Precontact	Lithic scatter
2674.9	21RO0025	Precontact	Artifact scatter, cemetery
4525.1	21RO0031	Historic	
3256.4	21RO0032	Historic	
578.1	21RO0033	Historic	Homestead ca 1910-1940s
0.0	21ROaa	Precontact	Artifact scatter
1351.4	21ROaf	Precontact	Cemetery
0.0	21ROao		
0.0	21ROd	Precontact	Toothed spear point and small copper point
3883.4	21ROh	Precontact	
3905.2	21ROm	Precontact	Fishing spear and adze

1289.3	21ROo	Precontact	Single artifact
0.0	21ROs	Precontact - Archaic (4-6,000 years old)	Adze and *Bison ocidentallis*
770.2	21ROu	Precontact	Projectile points and ceramics
1157.6	FS8	Precontact	Projectile point

In addition to the recorded archaeological sites, 72 historic resources have been recorded within one mile of the proposed project area, 11 of which are within 1,000 feet of the proposed project area (Table 1).

Table 2. Historic sites located within 1 mile of the proposed project area.

Distance from EIS Align. (FEET)	**Inventory #**	**Site Name**	**Address**
4850.3	IC-BAL-007	Conservative Mennonite Ch	NE corner Mn. Hwy. 7 & Co. Rd. 333
1790.1	IC-BAL-009	Spur Station	NE corner Mn. Hwy. 7 & Mn. Hwy. 8
2019.1	IC-BAL-010	T.J.'s Family Restaurant	1259 Scenic Hwy.
1309.3	IC-BAL-011	Alvar and Norma Hupila Hs	1281 Scenic Hwy.
630.6	IC-BAL-012	Balsam School	1290 Scenic Hwy.
106.8	IC-BAL-013	Balsam Bible Chapel	1300 Scenic Hwy.
2208.8	IC-BAL-014	Bersons Markat	off Mn. Hwy. 7
2944.0	IC-BAL-015	Robert E. Bergstrom Hs	1350 Scenic Hwy.
3237.0	IC-BAL-016	Kevin & Cynthia Malmquist Hs	102 Issac Lake Lane N.
4305.2	IC-BAL-022	Donna E. Wodahl Hs	1388 Scenic Hwy.
1615.5	IC-BAL-024	Bridge No. 7419	CR 336 over Prairie River
4478.5	IC-BAL-025	Bridge No. 7000	CSAH 8 over Prairie River
3515.1	IC-BEA-008	Hansen Log Hs	off Mn. Hwy. 65
3495.8	IC-BEA-009	Anderson Log Hs	off Mn. Hwy. 65
4511.6	IC-CAR-008	Bridge 88223	State .1 mi W of CR 541
594.3	IC-CAR-009	Deer Creek Dam	Deer Creek, northern Itasca County
1611.2	IC-EFC-006	storage shed	xxx Mn. Hwy. 38
5108.3	IC-EFC-007	Mn/DOT Service Building	xxx Mn. Hwy. 38
4422.0	IC-EFC-016	William Anderson Hs	xxx Mn. Hwy. 38
3614.8	IC-EFC-017	House	xxx Mn. Hwy. 38
4611.9	IC-IRT-008	Holman Mine Line to the Trout Lake Washing Plant	

2746.6	IC-IRT-009	Great Northern Railway Nashwauk-Gunn Line	
1557.5	IC-IRT-010	Duluth, Missabe & Northern Railway Alborn Branch Line	
4784.4	IC-IRT-013	Brown No. 2 Mine Stripping Dump	
2031.8	IC-IRT-016	Rhude Media Plant	xxxx TH 169
2178.9	IC-IRT-017	House	6670 US 169
1903.1	IC-IRT-018	House	6708 US 169
3850.2	IC-IRT-027	DM&N/DM&IR Railroad Corridor to Arcturus Mine	
2976.5	IC-IRT-029	Arcturus Mine Stripping Dump	
737.4	IC-IRT-030	DM&N/DM&IR Corridor to Arcturus Concentrator	
578.5	IC-IRT-031	Arcturus Mine Gravel Pit	
2775.9	IC-IRT-032	Arcturus Mine Lean Ore Dump	
3916.4	IC-IRT-033	Arcturus Mine Stripping Dump	
1616.8	IC-IRT-034	House	6730 US Hwy 169
639.5	IC-IRT-035	House	6826 US Hwy 169
3133.1	IC-IRT-037	Holman-Cliffs Mine Pit	
632.0	IC-IRT-038	Holman-Cliffs Mine	
4607.9	IC-IRT-039	Holman-Cliffs Stripping Dump	
4842.6	IC-IRT-039	Holman-Cliffs Stripping Dump	
4875.0	IC-IRT-041	Cleveland-Cliffs Concentrator Plant Site	
2114.7	IC-NWT-003	Bridge No. 88159	CSAH 8 over unnamed stream
3384.8	IC-TCC-005	Bridge No. L3811	CSAH 7 under BN Inc
2351.0	IC-TLT-004	Abandoned Log Hs & Barn	off Co. Hwy. 70
2464.9	IC-TLT-005	Jacob Edward Johnson Farmstead	off Co. Hwy. 70
2063.7	IC-TLT-009	Finnish Log Barn & Building	off Co. Hwy. 10
3847.6	IC-TLT-010	Trout Lake Apostolic Lutheran Ch	off Co. Hwy. 10
3933.4	IC-TLT-011	School & Teacherage	off Co. Hwy. 10
3621.5	IC-UOG-013	log barn	off Co. Rd. 445
3574.0	IC-UOG-043	Old Fredheim Lutheran Ch (moved)	Co. Rd. 42
3730.8	IC-UOG-044	Gunderson Homestead Cabin	off Co. Rd. 42
2924.7	IC-UOG-045	Winans Log Barn	off Co. Rd. 42
2500.4	IC-UOG-046	Kinn Farmhouse	off Co. Rd. 42

177.4	IC-UOG-074	Joyce Dahlberg Farmstead	xxx Mn. Hwy. 38
712.7	IC-UOG-075	Donna Gillespie Hs	xxx Mn. Hwy. 38
4010.3	IC-UOG-086	Bridge No. 7073	carries unpaved CSAH 42 over Bigfork River 4 M NE of Bigfork
3278.7	KC-UOG-031	Flowing Well	off U.S. Hwy. 71
4988.2	KC-UOG-035	Lumber Camp	of Co. Rd. 54
342.6	KC-UOG-070	Bridge No. 3570	carries CH 18 over East Fork of Rapid River
3163.2	LW-UOG-038	school	off Co. Hwy. 14
4663.3	RO-CDR-001	Cedarbend Surveyors Cabin	off Co. Hwy. 12
1181.7	RO-DET-002	town hall	off Mn. Hwy. 18
3938.7	RO-JAD-002	Bridge No. L9057	TR 142 over unnamed ditch
3945.1	RO-LAO-001	log building	off Mn. Hwy. 11
3881.5	RO-LAO-002	log building	off Mn. Hwy. 11
3954.5	RO-LAO-003	log building	off Mn. Hwy. 11
4653.9	RO-LAO-005	Bridge No. 3741	TR 26 over unnamed stream
4310.0	RO-LAO-007	Bridge No. 3743	TR 26 over unnamed stream
4283.5	RO-LAO-008	Bridge No. 3744	TR 26 over unnamed stream
381.4	RO-ROC-018	Roseau Land Port of Entry	41967 Hwy 310
5192.7	RO-RSC-001	school	xxx Main St.
3169.6	RO-UOG-002	Clear River (ghost town)	off Co. Hwy. 5
3273.9	RO-UOG-004	Clear River Forestry Office	off Co. Hwy. 5

Evaluations, Conclusions, and Recommendations

The Phase Ia background research revealed that 35 archaeological sites and 72 historic sites are recorded within one mile of the proposed project. Ten of these archaeological sites are located within 1,000 feet of the proposed project and six are either adjacent to or within the proposed project corridor. In addition to the recorded sites, this research defined areas with a high potential for unrecorded archaeological sites along the proposed corridor.

High potential areas are defined by considering many factors such as proximity to water and topography. Archaeological sites are more likely to be found near water (including historic or precontact water bodies), on prominent topographic features, and near recorded archaeological sites; however these are not the only locations archaeological sites could be located. In a wet setting such as the current project area, county ditches, and intermittent or seasonally flowing streams were not considered indicators for high potential archaeological areas.

Areas with low potential for archaeological sites include wetlands and areas with slopes over 20%. In order to delineate wetlands across this rather wet landscape, the National Wetlands Inventory for the region was used to help determine areas with low potential (MnDNR 2015). Areas mapped as wetlands were generally excluded as having high potential unless other factors were present, such as large rivers, prominent landforms, or stream confluences.

For historic structures, the Area of Potential Effect (APE) includes those areas within or adjacent to the proposed project as well as those areas visible from the proposed project area. Historic resources are investigated by conducting archival research as well as an on-site examination of the historic properties. Sources examined during property-specific archival research might include local and county histories, plat maps, insurance maps, and historic photographs.

Phase I archaeological survey methods typically involve pedestrian survey in areas where over 25% of the ground surface is visible (e.g. agricultural fields) in transects at five to 15-meter (m) intervals, as appropriate. In areas where less than 25% of the ground surface is visible, or where buried archaeological sites have a high probability of existing, archaeologists excavate shovel tests. These excavations measure 30 to 40 centimeters in diameter and are placed at 15-m intervals within areas of moderate and high potential, as appropriate. Soil is screened through ¼-inch mesh hardware cloth to determine if cultural materials are present.

Based on the results of the background research and mapping, it appears as though the proposed project area has 123 areas with a high to moderate potential for archaeological sites totaling approximately 59 miles of corridor (Appendix 1).

Bibliography

Anfinson, S.F.

1987 *The Prehistory of the Prairie Lake Region of the Northwestern Plains*. Ph.D. dissertation, Department of Anthropology, University of Minnesota, Minneapolis.

1997 *Southwestern Minnesota Archaeology*. Minnesota Prehistoric Archaeology Series No. 14. Minnesota Historical Society, St. Paul.

Boszhardt, Robert F., James L. Theler, and Thomas F. Kehoe

1986 "The Early Woodland Stage." In *Introduction to Wisconsin Archaeology: Background for Cultural Resource Planning*. The Wisconsin Archaeologist 67(3-4):243-262.

Eddins, O. Ned

n.d. *Pre-Historic Paleo-Indian Migration*. http://www.mountainsofstone.com/Prehistoric_indians.htm.

Johnson, Elden

1988 *Prehistoric Peoples of Minnesota, third edition*. Minnesota Historical Society, St. Paul.

Minnesota Department of Natural Resources (MnDNR)

2015 "National Wetlands Inventory Polygons (GIS Layer)." Minnesota Department of Natural Resources. St. Paul, Minnesota. https://gisdata.mn.gov/dataset/water-nat-wetlands-inventory Website viewed March 2015.

Minnesota Historical Society

1870 *Logging near St. Anthony Falls, Minneapolis*. Minnesota Historical Society Archives Photograph Collection. Location no. MH5.9 MP4.33 r94. Negative no. 9371-A.

1903 *Hennepin at the Falls of St. Anthony, A.D. 1680*. Lithographer: J. N. Marchand (1875-1921). Minnesota Historical Society Archives Art Collection. Location no. AV1983.149.4. Negative no. 75232.

Mississippi Valley Archaeology Center (MVAC)

n.d. *Early Cultures: Pre-European Peoples of Wisconsin*. http://www.uwlax.edu/mvac/preeuropeanpeople/earlycultures/index.html LaCrosse, Wisconsin. Website viewed on December 14, 2010.

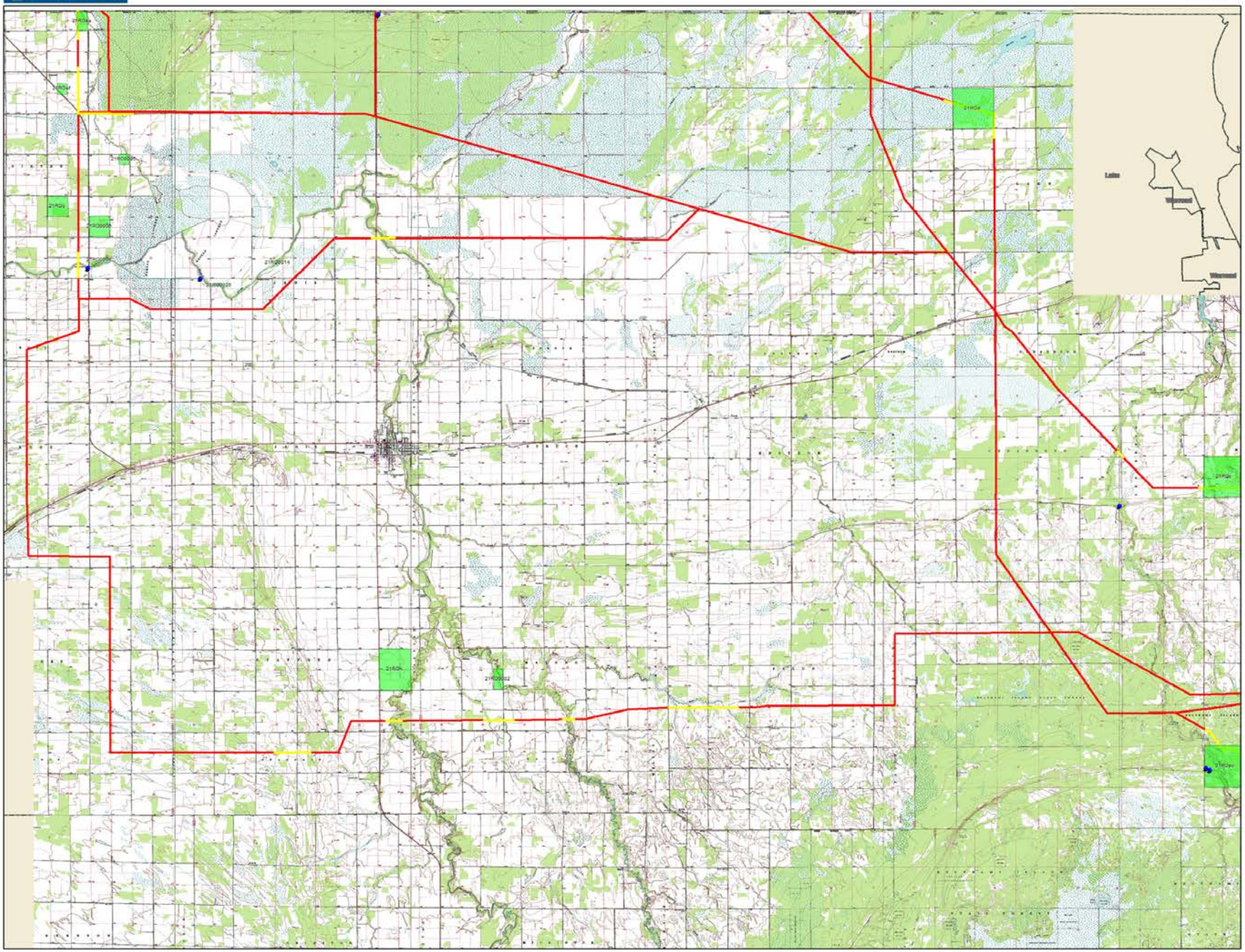
Appendix A: Maps

Maps move from the northwest end to the south/southeast.

- EIS Alignment depicted in red
- High potential areas depicted in yellow
- Historic sites depicted as blue dots
- Archaeological sites depicted as green polygons
- Archaeological points depicted as red flags

DELORME

XMap® 7



Data use subject to license.

© DeLorme. XMap® 7.

www.delorme.com

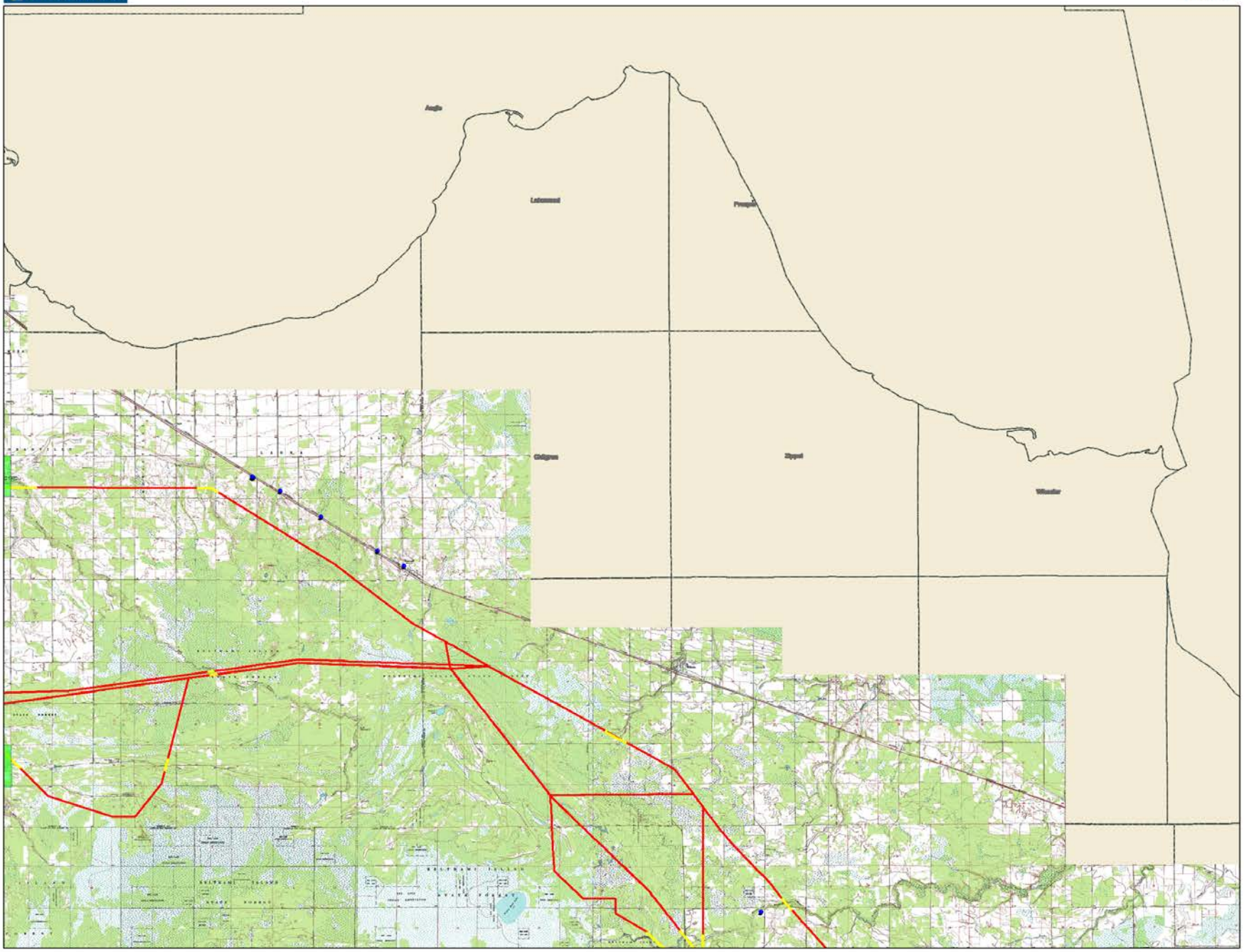
MN (1.6° E)

0 1 2 3 4 5 mi

Data Zoom 11-0

DELORME

XMap® 7



Data use subject to license.

© DeLorme. XMap® 7.

www.delorme.com

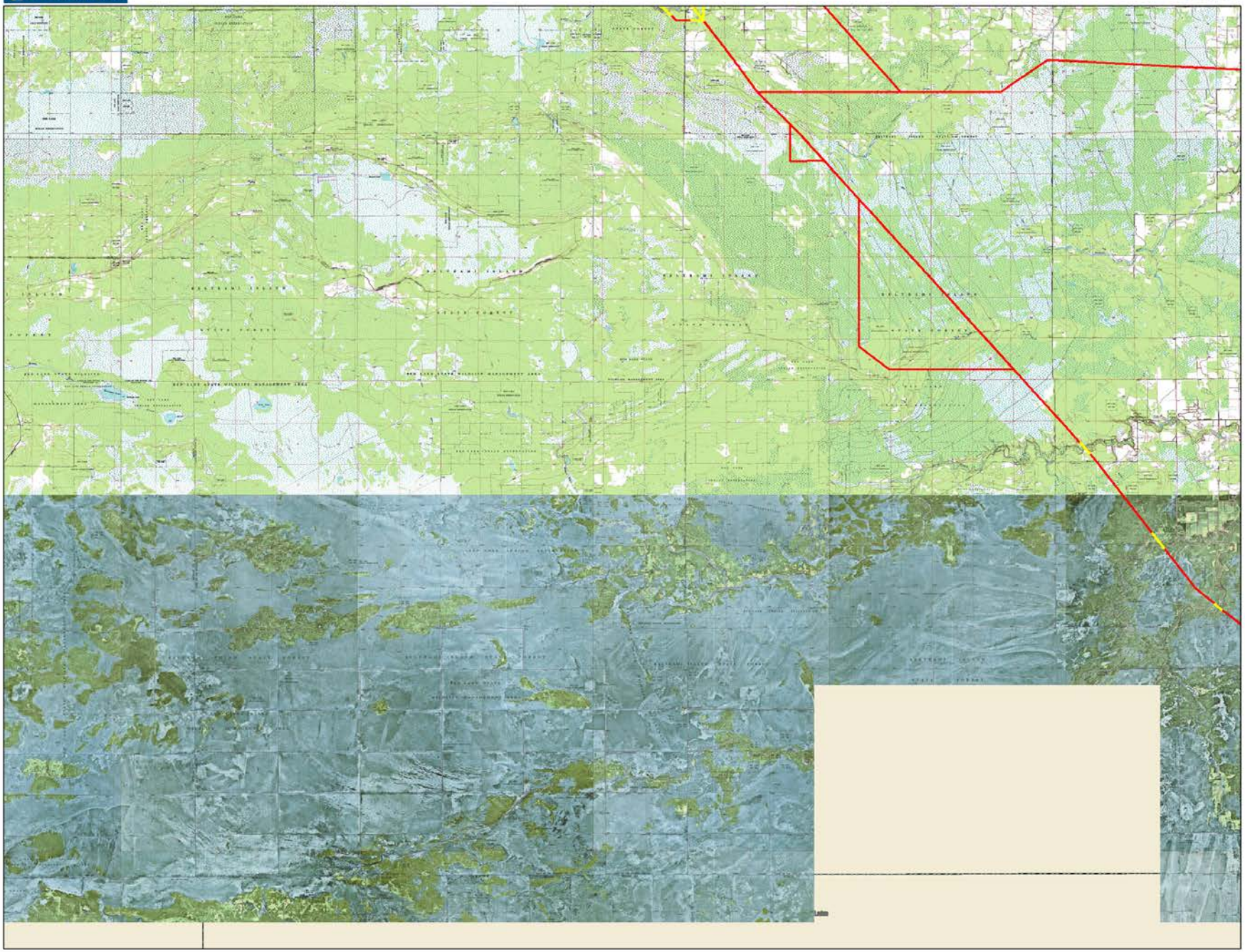
MN (1.1° E)

0 1 2 3 4 5 mi

Data Zoom 11-0

DELORME

XMap® 7



Data use subject to license.

© DeLorme. XMap® 7.

www.delorme.com

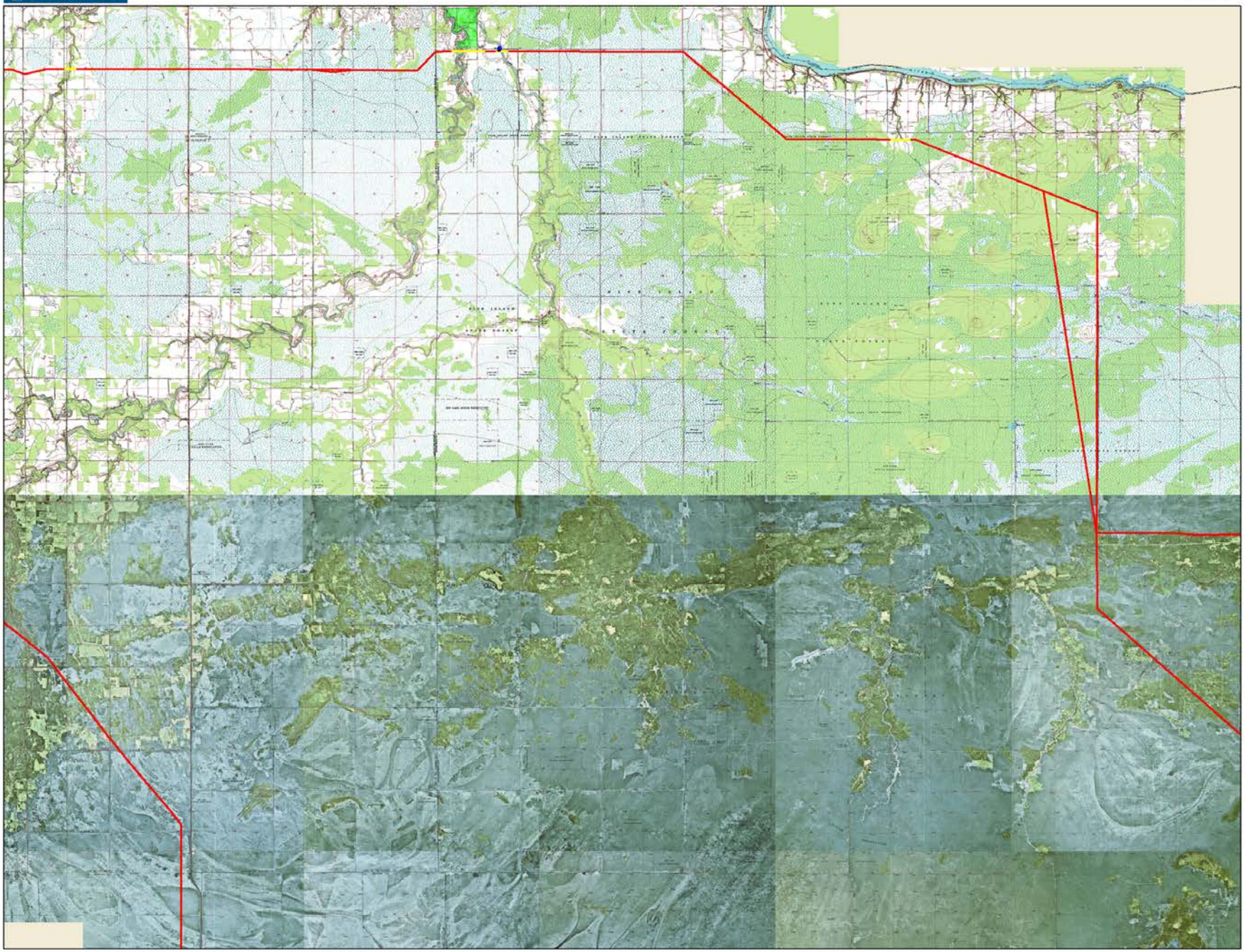
MN (1.1° E)

0 1 2 3 4 5 mi

Data Zoom 11-0

DELORME

XMap® 7



Data use subject to license.

© DeLorme. XMap® 7.

www.delorme.com

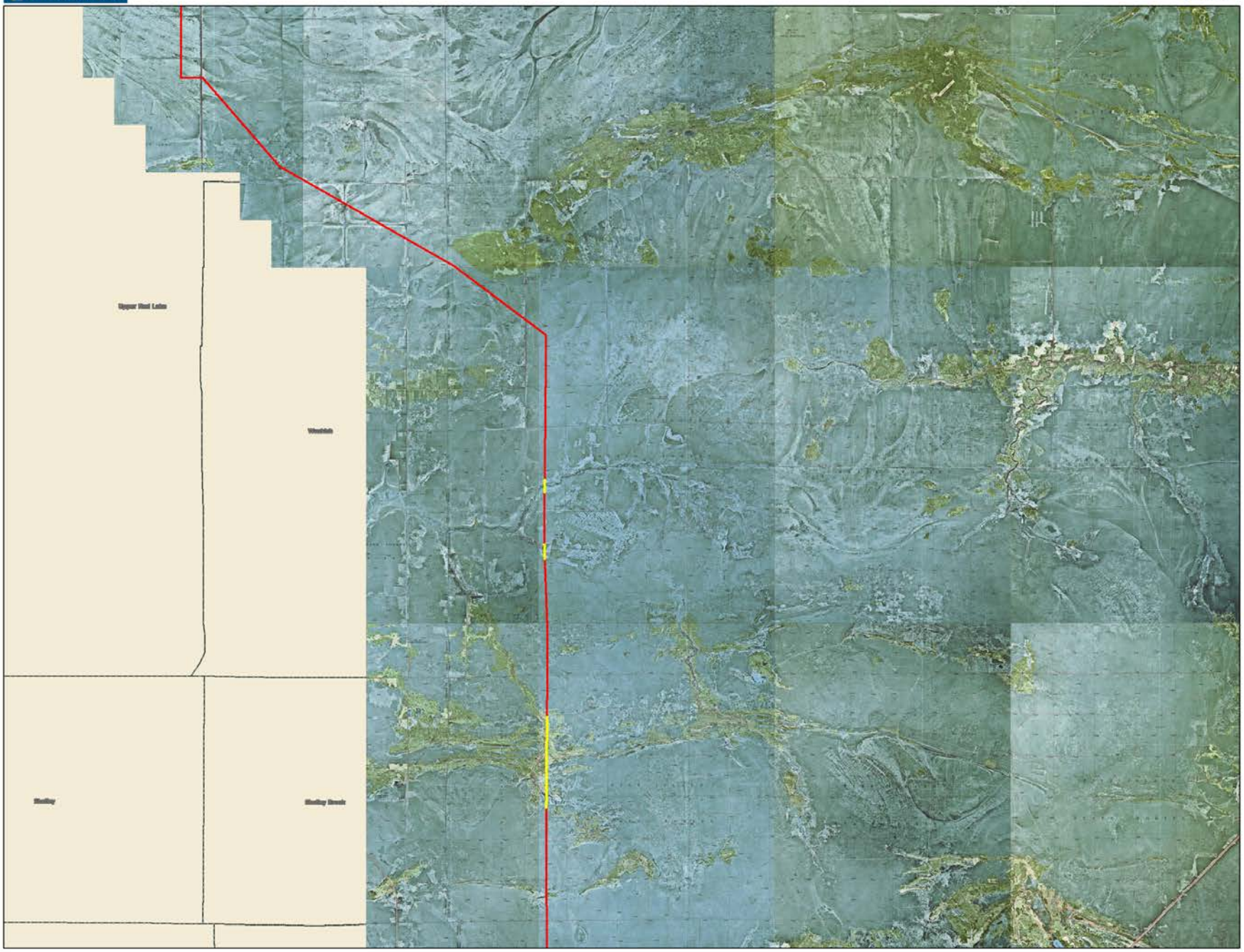
MN (0.5° E)

0 1 2 3 4 5 mi

Data Zoom 11-0

DELORME

XMap® 7



Data use subject to license.

© DeLorme. XMap® 7.

www.delorme.com

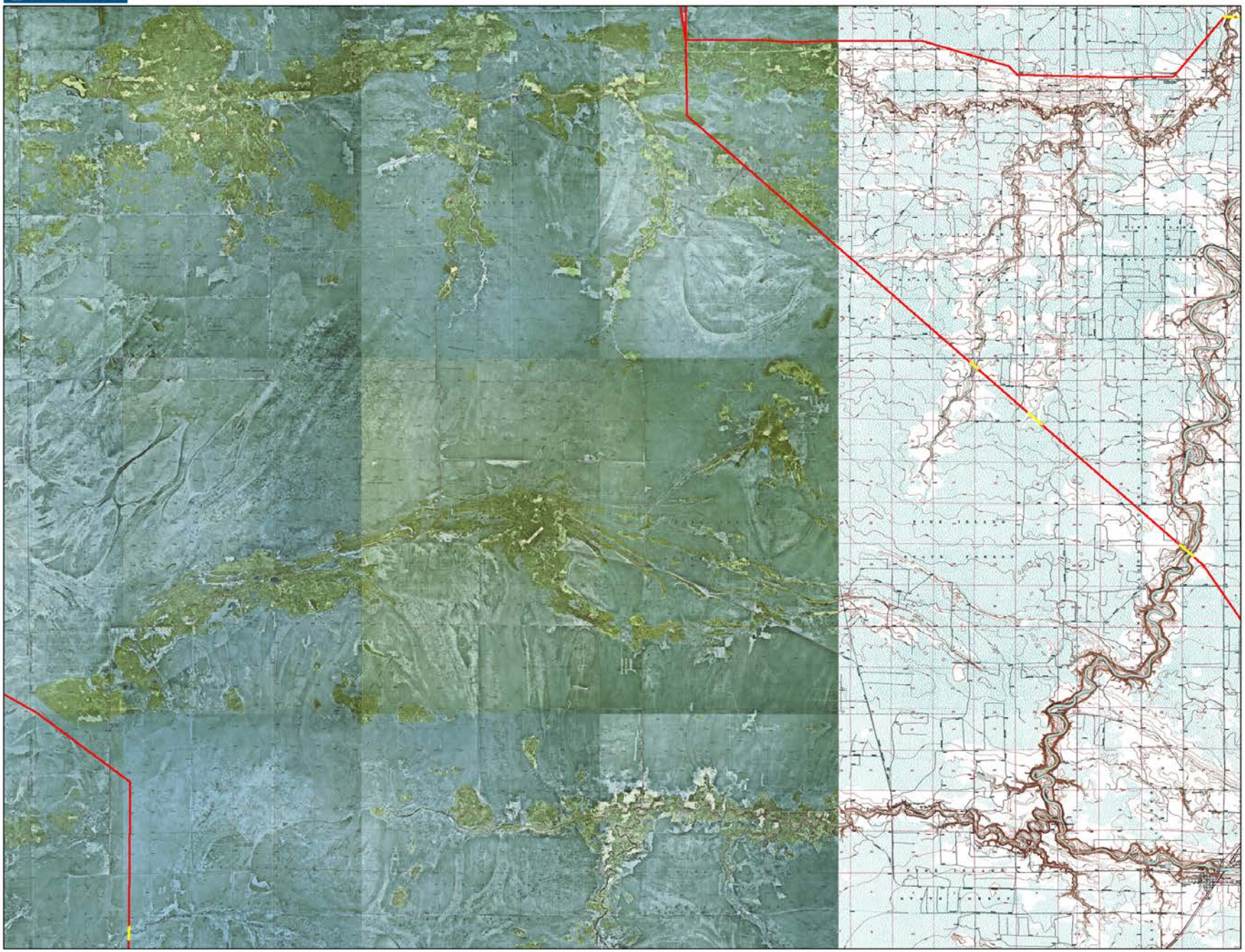
MN (0.6° E)

0 1 2 3 4 5 mi

Data Zoom 11-0

DELORME

XMap® 7



Data use subject to license.

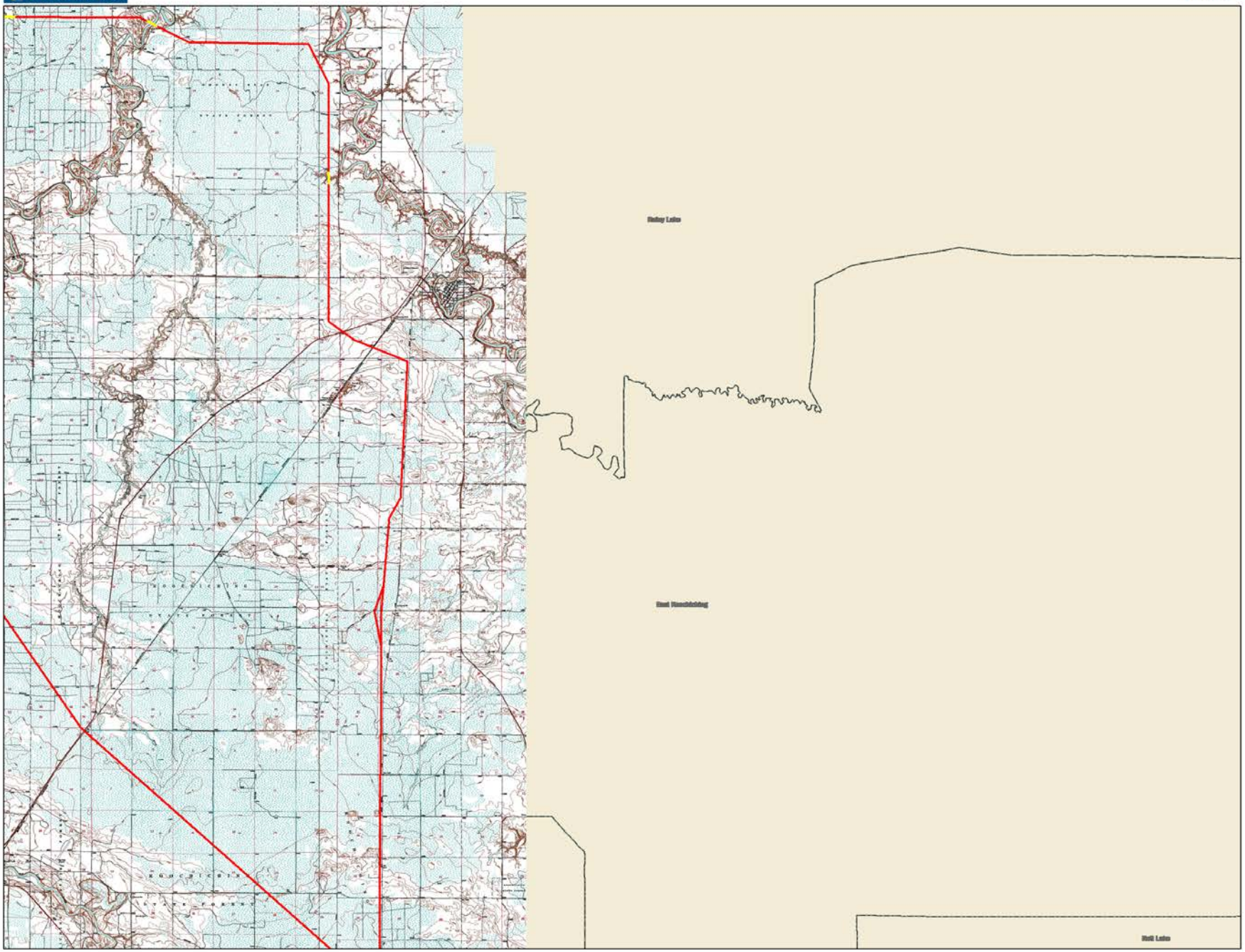
© DeLorme. XMap® 7.

www.delorme.com

MN (0.4° E)

0 1 2 3 4 5 mi

Data Zoom 11-0



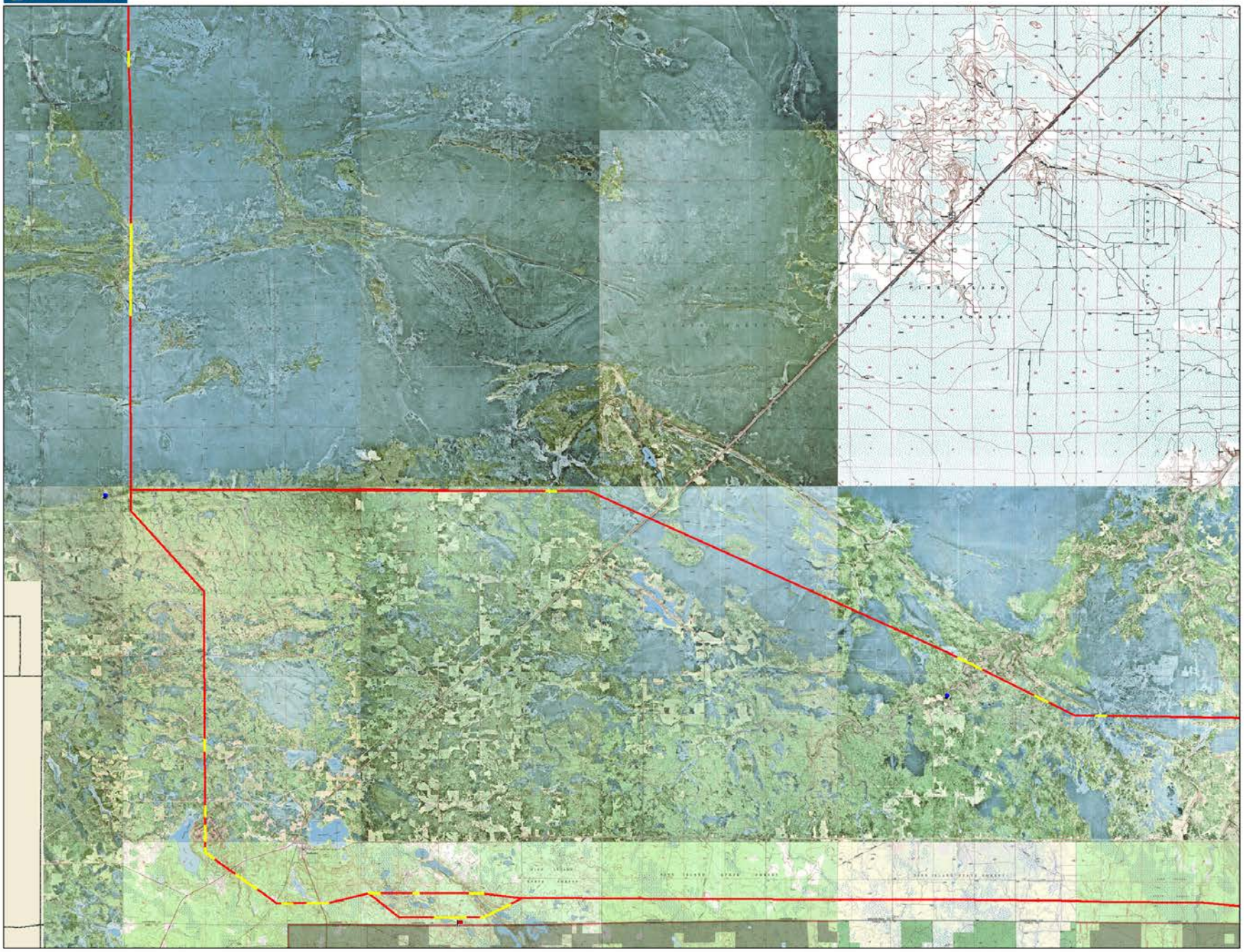
Data use subject to license.
© DeLorme. XMap® 7.
www.delorme.com

MN (0.2° W)

0 1 2 3 4 5 mi
Data Zoom 11-0

DELORME

XMap® 7



Data use subject to license.

© DeLorme. XMap® 7.

www.delorme.com

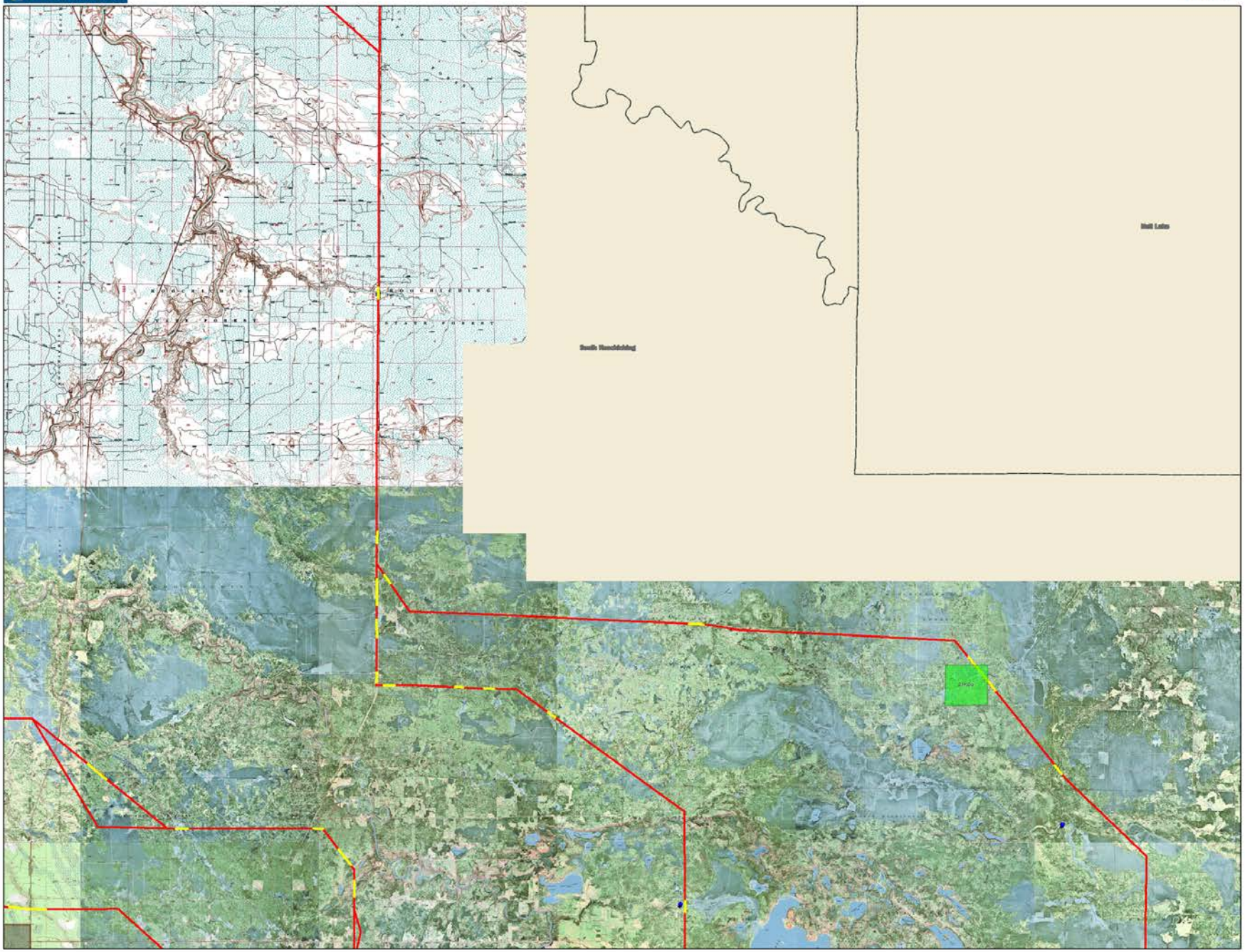
MN (0.4° E)

0 1 2 3 4 5 mi

Data Zoom 11-0

DeLORME

XMap® 7



Data use subject to license.

© DeLorme. XMap® 7.

www.delorme.com

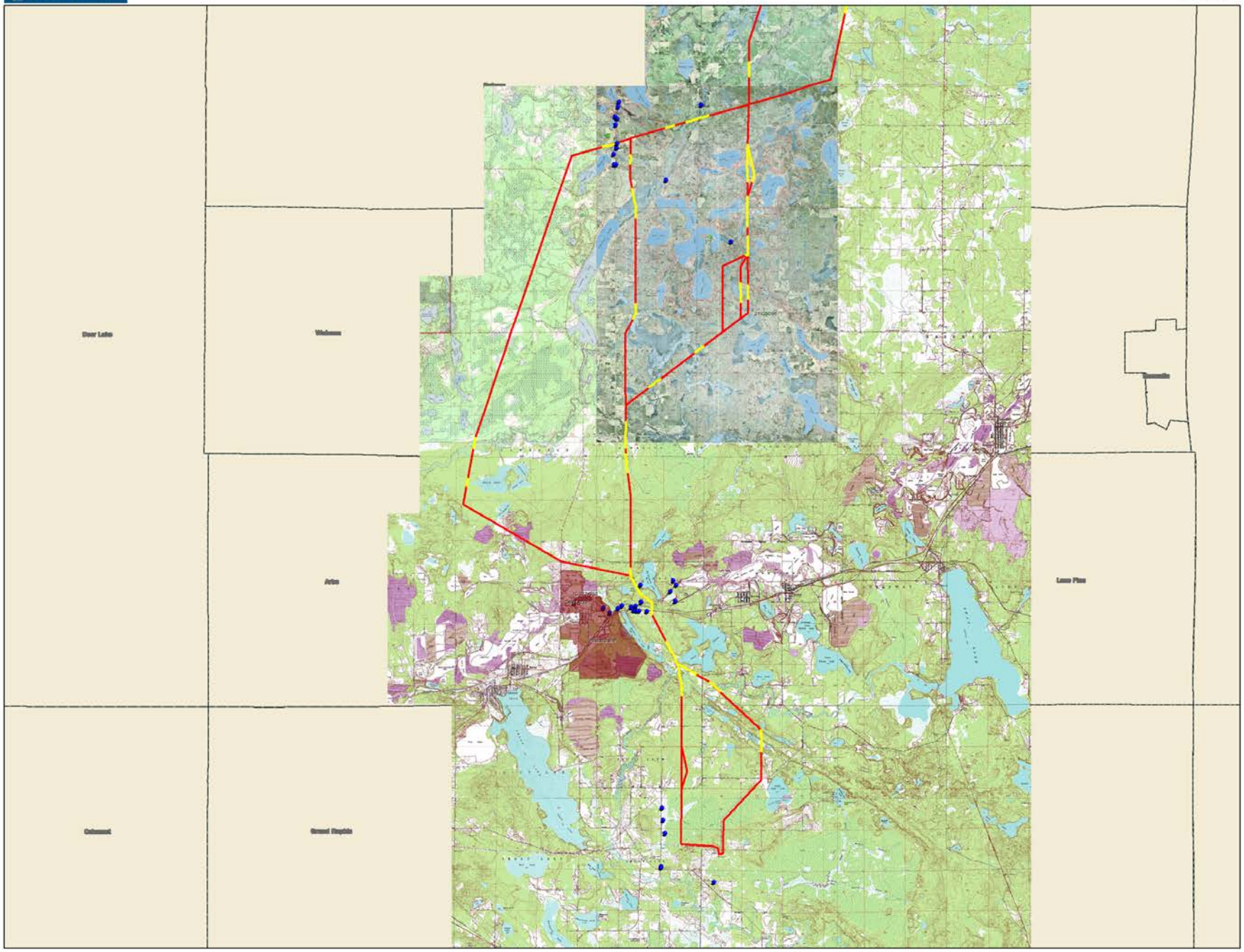
MN (0.1° W)

0 1 2 3 4 5 mi

Data Zoom 11-0

DeLORME

XMap® 7



Data use subject to license.

© DeLorme. XMap® 7.

www.delorme.com

MN (0.1° W)

0 1 2 3 4 5 mi

Data Zoom 11-0

Minnesota
Historical Society

Using the Power of History to Transform Lives
PRESERVING › SHARING › CONNECTING

STATE HISTORIC PRESERVATION OFFICE

December 30, 2014

Ms. Julie Ann Smith
National Electricity Delivery Division, OE-20
Office of Electricity Deliver and Energy Reliability
US Department of Energy
Washington, DC 20585

RE: Great Northern Transmission Line project (DOE/EIS -0499)
Multiple Counties, Minnesota
SHPO Number: 2013-2759

Dear Ms. Smith:

Thank you for the opportunity to comment on the above project. Information received in our office on 1 December 2014 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by Section 106 of the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800.

Per 36 CFR 800.3, we concur with the Department of Energy's (DOE) determination that the proposed Federal action, issuance of a Presidential permit for the international border crossing of the Great Northern Transmission Line (GNTL), constitutes and undertaking with the potential to cause effects on historic properties. Your agency has indicated that, for purposes of Section 106, the undertaking includes the border crossing and the entire length of the 220-mile overhead transmission line project, which is proposed to be constructed between the Minnesota-Manitoba international border northwest of Roseau in Roseau County to the existing Blackberry Substation near Grand Rapids in Itasca County. We appreciate the clarification provided in your November 19th letter which indicates that the Department of Energy will assume the role of lead federal agency in completing the Section 106 review.

Thank you for providing a summary of your agency's plan for public participation in the Section 106 process for this undertaking. It is our understanding that you will coordinate this with the process set forth under the National Environmental Policy Act (NEPA). Regarding your initial identification of potential consulting parties in the Section 106 process, we feel that the list you have provided thus far is comprehensive and sufficient. We suggest that your agency also consider the following two (2) state entities:

- Office of the State Archaeologist, Minnesota Department of Administration
- Minnesota Indian Affair's Council

Due to the consideration of several alternatives for the transmission line route and the extent of the linear corridor, we agree with your agency's proposal to develop and execute a programmatic agreement (PA) for this undertaking, pursuant to 36 CFR 800.14(b) and in consultation with our office and other consulting parties.

We have taken into consideration your agency's initial proposal for determining the areas of potential effect (APE) for both direct and indirect effects as provided in your November 19th letter. We look forward to continuing consultation on this matter as the APE will need to be determined prior to execution of a programmatic agreement.

Please feel free to contact me at 651-259-3456 or sarah.beimers@mnhs.org if you have any questions or concerns regarding our comment letter.

Sincerely,

Sarah J. Beimers

Sarah J. Beimers, Manager
Government Programs and Compliance

Department of Energy
Washington, DC 20585

January 14, 2015

Mags Rheude
US Fish and Wildlife Service
Twin Cities Ecological Field Office (Region 3)
4101 American Boulevard East
Bloomington, MN 55425

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Mags Rheude,

The purpose of this letter is to ensure that the US Fish and Wildlife Service, Twin Cities Ecological Field Office (Region 3) is aware that the Department of Energy (DOE) is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties." The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

As you are aware, Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation.

For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. Future information from the DOE, relevant to the Section 106 consultation (once underway), will also be posted to this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the

undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

DOE would like to obtain information from you about historic properties, including those of cultural importance to your agency, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project that identifies a primary point of contact for your agency, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. If no response is received within the time specified, the DOE will remove your agency from the Section 106 consulting party list for this project.

If you have questions regarding the DOE's on-going review of the proposed GNTL project, or your participation as a Section 106 consulting party, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 14, 2015

Jaime Loichinger
Office of Federal Agency Programs
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW, Suite 803
Old Post Office Building
Washington, DC 20004

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Jaime Loichinger,

The purpose of this letter is to ensure that the Office of Federal Agency Programs, Advisory Council on Historic Preservation is aware that the Department of Energy (DOE) is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties." The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

As you are aware, Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation.

For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. Future information from the DOE, relevant to the Section 106 consultation (once underway), will also be posted to this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a

demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process as a Section 106 consulting party, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation that identifies a primary point of contact for your agency, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. If no response is received within the time specified, the DOE will remove your agency from the Section 106 consulting party list for this project.

If you have questions regarding the DOE's on-going review of the proposed GNTL project, or your participation as a Section 106 consulting party, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 14, 2015

Stephen Elliott
Minnesota Historical Society
345 Kellogg Boulevard West
St. Paul, MN 55102-1903

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Stephen Elliott,

The purpose of this letter is to ensure that the Minnesota Historical Society is aware that the Department of Energy (DOE) is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties." The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

As you are aware, Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation.

For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. Future information from the DOE, relevant to the Section 106 consultation (once underway), will also be posted to this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the

undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process as a Section 106 consulting party, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation that identifies a primary point of contact for your agency, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. If no response is received within the time specified, the DOE will remove your agency from the Section 106 consulting party list for this project.

If you have questions regarding the DOE's on-going review of the proposed GNTL project, or your participation as a Section 106 consulting party, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Minnesota Archaeological Society
Fort Snelling History Center
Ft. Snelling, MN 55111-4061

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that the Minnesota Archaeological Society is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Kay Mack
Beltrami County Administrator
County Administration Building
701 Minnesota Ave. NW Suite 200
Bemidjii, MN 56601

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Kay Mack,

The purpose of this letter is to ensure that the Beltrami County Administrator is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Raymond Berger
Waskish Town Board
56090 Waskish Road NE
Washish, MN 56685

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Raymond Berger,

The purpose of this letter is to ensure that the Waskish Town Board is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Trish Klein
Itasca County Administrator
Administrative Service Office
123 NE 4th Street
Grand Rapids, MN 55744

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Trish Klein,

The purpose of this letter is to ensure that the Itasca County Administrator is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Matt David
City of Effie
Effie Town Office
PO Box 129
Effie, MN 56639

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Matt David,

The purpose of this letter is to ensure that the City of Effie is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Mike Troumbly
City of Taconite
Taconite Town Office
PO Box 137
Taconite, MN 55786

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Mike Troumbly,

The purpose of this letter is to ensure that the City of Taconite is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

G. Andy Martin
Township of Ardenhurst
64185 Moose Bay Trail
Northome, MN 56661

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear G. Andy Martin,

The purpose of this letter is to ensure that the Township of Ardenhurst is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

John Kannas
Township of Balsam
40874 County Road 336
Bovey, MN 55709

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear John Kannas,

The purpose of this letter is to ensure that the Township of Balsam is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Justin Root
Township of Bigfork
100 South State Highway 38
Bigfork, MN 56628

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Justin Root,

The purpose of this letter is to ensure that the Township of Bigfork is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Bruce Scofield
Township of Carpenter
11032 Scofield Road
Togo, MN 55723

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Bruce Scofield,

The purpose of this letter is to ensure that the Township of Carpenter is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that the is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Ted Winkelman
Township of Grattan
57124 County Road 31
Northome, MN 56661

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Ted Winkelman,

The purpose of this letter is to ensure that the Township of Grattan is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Nicholas Matanich
Township of Greenway
PO Box 824
Calumet, MN 55716

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Nicholas Matanich,

The purpose of this letter is to ensure that the Township of Greenway is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Township of Iron Range
33607 Scenic Hwy
Bovie, MN 55709

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that the Township of Iron Range is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on

this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Frank Olson
Township of Lawrence
24867 County Road 57
Bovey, MN 55709

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Frank Olson,

The purpose of this letter is to ensure that the Township of Lawrence is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Richard Curtis
Chairman, Township of Liberty
4315 Henry Lane NW
Bemidji, MN 56601

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Mr. Curtis,

The purpose of this letter is to ensure that the Township of Liberty is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Little Sand Lake Association
P.O. Box 22262
St. Paul, MN 55122

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that the Little Sand Lake Association is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Jeffery Ekholm
Township of Nashwauk
36666 Pleasantview Road
Nashwauk, MN 55769

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Jeffery Ekholm,

The purpose of this letter is to ensure that the Township of Nashwauk is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Daniel Grundmeier
Township of Nore
64065 US Highway 71
Blackduck, MN 56630

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Daniel Grundmeier,

The purpose of this letter is to ensure that the Township of Nore is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that the is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Rick Ferguson
Township of Pomroy
53176 County Road 31
Northome, MN 56661

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Rick Ferguson,

The purpose of this letter is to ensure that the Township of Pomroy is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Pamela Perry
Township of Trout Lake
26439 Birch Drive
Bovey, MN 55709

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Pamela Perry,

The purpose of this letter is to ensure that the Township of Trout Lake is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Teresa Briggs
Koochiching County Administration
Koochiching County Courthouse
715 4th Street
International Falls, MN 56649

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Teresa Briggs,

The purpose of this letter is to ensure that the Koochiching County is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Larry Salmonson
City of Northome
Northome City Hall
12068 Main Street
Northome, MN 56661

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Larry Salmonson,

The purpose of this letter is to ensure that the City of Northome is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that the is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Patricia Beckel
Lake of the Woods County Board of Commissioners
Lake of the Woods County Government Center
206 8th Avenue SE
Baudette, MN 56623

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Patricia Beckel,

The purpose of this letter is to ensure that the Lake of the Woods County Board of Commissioners is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Glenda Phillipe
Roseau County Board of Commissioners
Roseau County Courthouse
606 5th Avenue SW
Roseau, MN 56751

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Glenda Phillipe,

The purpose of this letter is to ensure that the Roseau County Board of Commissioners is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Warren Lovejoy
Township of Cedarbend
28925 530th Avenue
Warroad, MN 56763

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Warren Lovejoy,

The purpose of this letter is to ensure that the Township of Cedarbend is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Warren Stoe
Township of Dieter
28459 370th Street
Roseau, MN 56751

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Warren Stoe,

The purpose of this letter is to ensure that the Township of Dieter is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Greg Halvorson
Township of Jadis
33911 State Highway 310
Roseau, MN 56751

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Greg Halvorson,

The purpose of this letter is to ensure that the Township of Jadis is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Greg Boynton
Township of Lake
56264 County Road 137
Warroad, MN 56763

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Greg Boynton,

The purpose of this letter is to ensure that the Township of Lake is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Rose Ann Lee
Township of Pohlitz
25489 County Road 10
Badger, MN 56714

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Rose Ann Lee,

The purpose of this letter is to ensure that the Township of Pohlitz is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Sir or Madam,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Jim Atkinson
Minnesota Power
30 West Superior Street
Duluth, MN 55802

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Jim Atkinson,

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us as the project proponent as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Annamarie Hill
Minnesota Indian Affairs Council (St. Paul Office)
161 Saint Anthony Ave., Suite 919
St. Paul, MN 55103

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Annamarie Hill,

The purpose of this letter is to ensure that the Minnesota Indian Affairs Council (St. Paul Office) is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Jim Jones
Minnesota Indian Affairs Council (Bemidji Office)
3801 Bemidji Avenue NW, Suite 5
Bemidji, MN 56601

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Jim Jones,

The purpose of this letter is to ensure that the Minnesota Indian Affairs Council (Bemidji Office) is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Linda Lemmer
Beltrami County Administrator
130 Minnesota Avenue SW
Bemidjii, MN 56601

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Linda Lemmer,

The purpose of this letter is to ensure that Beltrami County is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Lilah Crowe
Itasca County Historical Society
201 North Pokegama Avenue
Grand Rapids, MN 55744

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Lilah Crowe,

The purpose of this letter is to ensure that the Itasca County Historical Society is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Edgar Oerichbauer
Koochiching County Historical Society
214 6th Avenue
International Falls, MN 56649

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Edgar Oerichbauer,

The purpose of this letter is to ensure that the Koochiching County Historical Society is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Marlys Hearst
Lake of the Woods County Historical Society
206 8th Avenue SE, Suite 150
119 8th Avenue SE
Baudette, MN 56623

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Marlys Hearst,

The purpose of this letter is to ensure that the Lake of the Woods County Historical Society is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Britt Dahl
Roseau County Historical Society
121 Center Street East
Suite 101
Roseau, MN 56751

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Britt Dahl,

The purpose of this letter is to ensure that the Roseau County Historical Society is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Eva Stengal
12956 Twin Oaks Road NE
Saum, MN 56650

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Eva Stengal,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on

this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Ruth Stukel
202 Miane Avenue NE
Box 688
Warroad, MN 56763

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Ruth Stukel,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Patricia Maus
Archives and Special Collections
University of Minnesota Duluth Library
416 Library Drive
Duluth, MN 55812

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Patricia Maus,

The purpose of this letter is to ensure that the University of Minnesota Duluth Library is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The

GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Christopher Welter
1005 Discovery Drive
Chisholm, MN 55719

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Christopher Welter,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the *Great Northern Transmission Line Scoping Summary Report* (November 2014), can be viewed on

this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 14, 2015

Bill Storm
Minnesota Department of Commerce
Energy Environmental Review and Analysis
85 7th Place East, Suite 500
Saint Paul, MN 55101

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Bill Storm,

The purpose of this letter is to ensure that the MN Department of Commerceis aware that the Department of Energy (DOE) is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties." The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

As you are aware, Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation.

For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. Future information from the DOE, relevant to the Section 106 consultation (once underway), will also be posted to this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the

undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

DOE would like to obtain information from you about historic properties, including those of cultural importance to your agency and its constituents, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process as a Section 106 consulting party, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation that identifies a primary point of contact for your agency, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. If no response is received within the time specified, the DOE will remove your agency from the Section 106 consulting party list for this project.

If you have questions regarding the DOE's on-going review of the proposed GNTL project, or your participation as a Section 106 consulting party, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Department of Energy
Washington, DC 20585

January 13, 2015

Doug Gasek
75 W 5th Street
416 Landmark Center
St. Paul, MN 55102

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Doug Gasek,

The purpose of this letter is to ensure that you are aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

Department of Energy
Washington, DC 20585

January 13, 2015

Elizabeth Merritt
National Trust for Historic Preservation
1785 Massachusetts Ave. NW
Washington, DC 20036-2117

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Elizabeth Merritt,

The purpose of this letter is to ensure that the National Trust for Historic Preservation is aware that Minnesota Power, an operating division of ALLETE, Inc., has applied to the U.S. Department of Energy's (DOE's) Office of Electricity Delivery and Energy Reliability for a Presidential permit to construct, operate, maintain, and connect an electric transmission line across the U.S.-Canada border. Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us, as provided for by Section 106 and its implementing regulations.

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. Minnesota Power is also seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE), a cooperating agency to DOE in the preparation of the above mentioned EIS. DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. As a part of its scoping efforts, DOE held eight NEPA public scoping meetings from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. For more information on DOE's NEPA review and preparation of the EIS, please visit the DOE GNTL EIS website at http://www.GreatNorthernEIS.org. The GNTL Presidential permit application (including an initial cultural resources study), NOI and the

Great Northern Transmission Line Scoping Summary Report (November 2014), can be viewed on this website.

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2).

The DOE would like to obtain information from you about historic properties, including those of cultural importance to your organization and its members, in or near the project area, and also to provide you an opportunity to identify your concerns about such properties, including the identification of potential mitigation measures. Your assistance in the identification and evaluation of historic properties will provide us the opportunity to resolve any adverse effects this undertaking may have on these properties. If available, we would welcome any information on the location and importance of archaeological sites, historic structures, and any other localities of interest to you that are known to occur in or near the proposed project area.

If you would like to participate in the Section 106 consultation process, please confirm within 30 calendar days of the date of this letter, by sending a letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for your organization (as applicable) in your acceptance letter. If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from GNTL Scoping Summary Report)

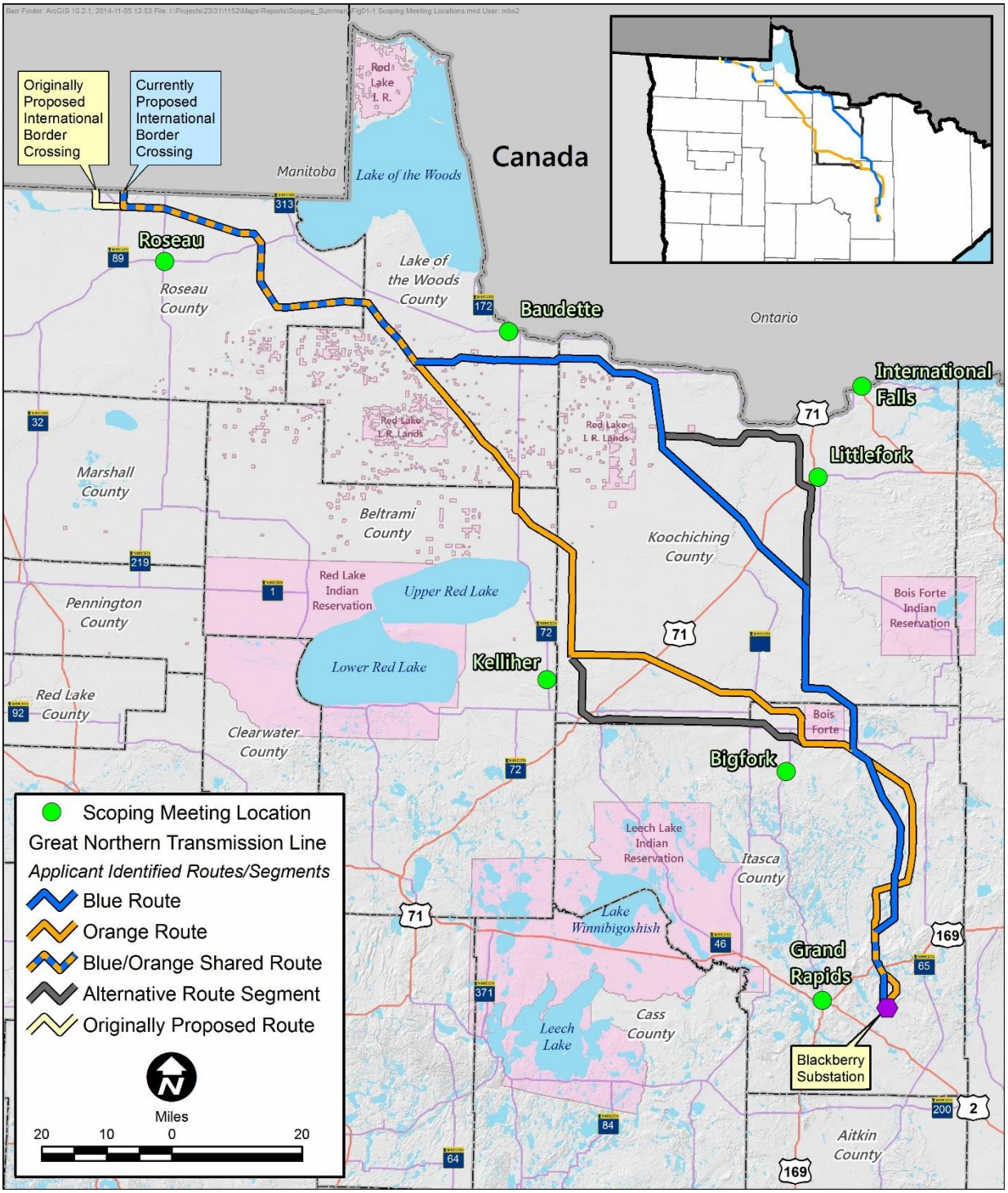


Figure 1-1 Project Regional Map

P-157

Kay L. Mack
BELTRAMI COUNTY
ADMINISTRATOR
701 Minnesota Ave NW, STE 200
Bemidji, MN 56601-3178
Telephone: 218-333-4109
FAX: 218-333-4246

Jan 21, 2015

Julie Ann Smith
NEPA Document Manager

Dear Ms. Smith:

Beltrami County will act as a Section 106 consulting party for the proposed GNTL project. It is only the orange route that would impact a small portion of NE Beltrami County.

The contact person for this would be:

Kay Mack, Administrator
701 Minnesota Ave NW, Ste 200
Bemidji, MN 56601

kay.mack@co.beltrami.mn.us

While I do not think that there will be much historical or cultural impacts to Beltrami County, I do appreciate your including us.

Sincerely,

Kay Mack

Kay L. Mack

Department of Energy
Washington, DC 20585

January 14, 2015

Jim Atkinson
Minnesota Power
30 West Superior Street
Duluth, MN 55802

SUBJECT: Invitation to Consult on the Proposed Great Northern Transmission Line Project

Dear Jim Atkinson,

Pursuant to Section 106 of the National Historic Preservation Act of 1966 (NHPA) and 36 CFR Part 800, "Protection of Historic Properties," the DOE is initiating the Section 106 consultation process on the proposed Great Northern Transmission Line (GNTL) project to determine any potential adverse effects on historic properties. The DOE invites you to consult with us as the an applicant for a Federal permit as provided for by Section 106 and its implementing regulations at 36 CFR § 800.2(b)(4).

The DOE is meeting its obligations under the NHPA concurrently with the preparation of an environmental impact statement (EIS) pursuant to the National Environmental Policy Act of 1969 (NEPA). Because Minnesota Power is seeking authorizations from the U.S. Army Corps of Engineers – St. Paul District (USACE) and U.S. Fish and Wildlife Service, cooperating agencies to DOE in the preparation of the above mentioned EIS, DOE is also acting as the lead federal agency for purposes of compliance with Section 106 for the NEPA cooperating agencies (per 36 CFR § 800.2(a)(2)).

Under Section 106, the DOE must identify and consider the potential effects of its actions on historic properties through a collaborative framework (consultation) to identify historic properties potentially affected by the proposed project, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects to historic properties (36 CFR §800.1(a)). In addition to the State Historic Preservation Officer (SHPO), federally recognized Indian tribes, and the Advisory Council on Historic Preservation (ACHP), the applicant for Federal assistance, permits licenses or other approvals, Section 106 consulting parties may include certain individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties (36 CFR §800.2). General information about the Section 106 process is available through the ACHP website at www.achp.org.

In order to properly document Minnesota Power's participation in the Section 106 process, please confirm within 30 calendar days of the date of this letter, please send a

letter accepting this invitation to act as a Section 106 consulting party for the proposed GNTL project, either as an attachment to an email at Juliea.Smith@hq.doe.gov, or by postal mail to 1000 Independence Avenue, SW, Washington, D.C., 20585. Please also include information for a primary point of contact for Minnesota Power in Section 106 consultations in your acceptance letter.

If you have any questions or concerns, please contact me at any time at the above email address or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy

30 west superior street / duluth, minnesota 55802-2093 / fax: 218-723-3955 /www.allete.com

David R. Moeller
Senior Attorney
218-723-3963
dmoeller@allete.com

February 3, 2015

VIA E-MAIL and U.S. MAIL
Juliea Smith
Department of Energy
1000 Independence Avenue, S.W.
Washingston, D.C., 20585

Re: Minnesota Power Acceptance Letter for Section 106 Consultation

Dear Ms. Smith,

Minnesota Power is in receipt of the United States Department of Energy's ("DOE") January 14, 2015 letter inviting Minnesota Power to consult on the Section 106 process for the Great Northern Transmission Line Project. As the applicant, Minnesota Power accepts this invitation and looks forward to continuing the active engagement with DOE and other stakeholders for the Great Northern Transmission Line Project. Please consider Jim Atkinson the primary project contact and myself, David Moeller, the second project contact.

Please contact me if you have any questions or need additional information.

Yours truly,

David R. Moeller

DRM:sr
Cc: Jim Atkinson

Preserving America's Heritage

July 25, 2014

Ms. Julie Ann Smith, PhD
Principal NEPA Document Manager
U.S. Department of Energy
Office of Electricity Delivery and Energy Reliability
National Electricity Delivery Division
1000 Independence Avenue, SW
Washington, DC 20585

Ref: *Proposed Great Northern Transmission Line Project*
State of Minnesota

Dear Dr. Smith:

On July 14, 2014, the Advisory Council on Historic Preservation (ACHP) received notice from the U.S. Department of Energy (DOE) that it intends to develop an Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act (NEPA) for the Great Northern Transmission Line (GNTL) project. As we understand, the project consists of the issuance of a permit to Minnesota Power (applicant) for the construction, operation, maintenance and connection of approximately 220 miles of overhead transmission lines. DOE has sent this notice to the ACHP to ensure that we are aware of the project and invite us to participate in the ongoing environmental analysis.

While we appreciate this notice, it is unclear how it relates to DOE's compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800). Since the notice only references compliance with NEPA, we request that DOE clarify its intent to coordinate the NEPA and NHPA reviews. If DOE intends to use the substitution process contained within our regulations at 36 CFR Part 800.8(c), then DOE will need to notify the Minnesota State Historic Preservation Officer (SHPO) as well as the ACHP of this decision. If DOE intends to coordinate its Section 106 review with its NEPA review, then we request that DOE make the appropriate findings of effect for this undertaking in consultation with the SHPO and other consulting parties. Should DOE make a finding of adverse effect, please notify the ACHP in accordance with 36 CFR Part 800.11(e).

To assist DOE in making its decision regarding coordination or substitution of NEPA and NHPA, we refer you to the handbook we jointly published with the Council on Environmental Quality (CEQ) in March 2013. We suggest you consider using the checklist contained within the handbook as it outlines the questions DOE should contemplate when determining how it will best comply with Section 106.

We look forward to receiving DOE's response. If you have any questions about our comments, please contact Ms. Jaime Loichinger at (202) 517-0219 or via email at jloichinger@achp.gov.

Sincerely,

Charlene Dwin Vaughn, AICP
Assistant Director
Office of Federal Agency Programs
Federal Permitting, Licensing and Assistance Section

Department of Energy
Washington, DC 20585

November 22, 2014

Charlene Dwin Vaughn, AICP
Assistant Director, Office of Federal Agency Programs
Federal Permitting, Licensing and Assistance Section
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, D.C. 20001-2637

SUBJECT: Section 106 Consultation under the National Historic Preservation Act (NHPA) for the proposed *Great Northern Transmission Line Project* (DOE/EIS-0499)

Dear Ms. Vaughn:

This letter is in response to your letter of July 25, 2014, to the U.S. Department of Energy (DOE or the Department) regarding DOE's compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800). The intent of this correspondence is to respond directly to the questions you pose in your letter as well as to update you as to the status of DOE's notification to and request for concurrence for initiation of the Section 106 consultation process with the Minnesota State Historic Preservation Officer (SHPO). In addition, DOE is providing notification to the Advisory Council on Historic Preservation (ACHP) of its intent to utilize a programmatic agreement to properly comply with the requirements of the NHPA implementing regulations identified above.

As you are aware, DOE is in the process of preparing its draft Environmental Impact Statement (EIS) for the proposed Great Northern Transmission Line (GNTL) project in Roseau, Lake of the Woods, Koochiching, and Itasca Counties in northern Minnesota. DOE is preparing its draft EIS pursuant to its obligations under the National Environmental Policy Act (NEPA) to evaluate environmental impacts of providing a Presidential permit to Minnesota Power for the construction, operation, maintenance, and connection of the portion of the transmission line within the United States. The proposed DOE federal action is the potential grant of a Presidential permit for the international border crossing requested by Minnesota Power as part of its proposal. This action has been determined by DOE to be an undertaking that has potential to cause adverse effects on historic properties as defined in implementing regulations at 36 CFR §800.16(y).

The Department is coordinating its compliance with Section 106 of the NHPA with its review under NEPA according to the process set out in 36 CFR §800.3(b). DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), which specifically indicated that cultural and historic resources are being analyzed as part of the federal environmental review. Per standing policy, DOE will continue to explicitly solicit information from the public (via the NEPA process) regarding cultural and historic resources through its Notice of Availability of its draft EIS when

published in the *Federal Register*. DOE will also make cultural resources reports and information publicly available on the GNTL project EIS website, as appropriate.

On November 21, 2014, DOE sent a letter to the MN SHPO requesting formal initiation of the Section 106 consultation process for the proposed GNTL project. A copy of that letter is enclosed for your information. If you would also like a copy of the supporting materials referenced in the initiation request letter to MN SHPO, the Department will gladly provide those to you upon request.

Because DOE is currently considering several alternatives under NEPA for the proposed GNTL project that are large linear tracts of land and the resultant complexity of its analysis, DOE has determined that a phased approach for Section 106 identification and evaluation efforts in accordance with the process set forth in 36 CFR §800.4(b)(2) is appropriate. The Department, therefore, proposes the execution of a programmatic agreement (PA) pursuant to 36 CFR §800.14(b) in order to properly defer final identification and evaluation of historic properties under Section 106. A programmatic agreement for the GNTL project would delineate the process by which the likely presence of historic properties within the APE for each alternative under consideration through background research, consultation, with an appropriate level of field investigation to be performed, while taking into consideration the magnitude of the undertaking and its likely effects, and the views of the Council, SHPO, THPO(s), Indian Tribes, and other consulting parties.

In close, DOE appreciates your response to our July 14, 2014, notification letter regarding the Great Northern Transmission Line Project EIS (DOE/EIS-0499) and associated advice contained therein. The Department would appreciate any information, further guidance, and/or concurrence in writing on whether its proposal for a phased approach to identification and evaluation through the execution of a PA is appropriate in this case so that DOE may properly document its compliance with Section 106 of the NHPA in its administrative record.

I very much look forward to working with you and your staff in the future and appreciate your assistance in this effort. If you have any questions or concerns, please contact me at any time at Juliea.Smith@hq.doe.gov or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enc: DOE Section 106 Initiation Request Letter to MN SHPO (November 21, 2014)

Department of Energy
Washington, DC 20585

November 21, 2014

Mr. Stephen Elliot
State Historic Preservation Officer
Minnesota Historical Society
345 Kellogg Boulevard West
St. Paul, MN 55102-1906

SUBJECT: Initiation Request for Section 106 Consultation under the National Historic Preservation Act (NHPA) for the proposed *Great Northern Transmission Line Project* (DOE/EIS-0499)

Dear Mr. Elliot:

The U.S. Department of Energy (DOE or the Department) is in the process of preparing its draft Environmental Impact Statement (EIS) for the proposed Great Northern Transmission Line (GNTL) project in Roseau, Lake of the Woods, Koochiching, and Itasca Counties in northern Minnesota. DOE is preparing its draft EIS pursuant to its obligations under the National Environmental Policy Act (NEPA) to evaluate environmental impacts of providing a Presidential permit to Minnesota Power for the construction, operation, maintenance, and connection of the portion of the transmission line within the United States. The proposed DOE federal action is the potential grant of a Presidential permit for the international border crossing requested by Minnesota Power as part of its proposal. This action has been determined by DOE to be an undertaking that has potential to cause adverse effects on historic properties per the Advisory Council on Historic Preservation's (ACHP's) NHPA implementing regulations at 36 CFR §800.3(a).

The Department is coordinating its compliance with Section 106 of the NHPA with its review under NEPA according to the process set out in 36 CFR §800.3(b). Per standing policy, DOE will explicitly solicit information from the public (via the NEPA process) regarding cultural and historic resources through its Notice of Availability of its draft EIS when published in the *Federal Register*. DOE will also make cultural resources reports and information publicly available on the GNTL project EIS website, as appropriate.

In this letter DOE provides you with a summary of the actions that the Department is taking to comply with Section 106 of the NHPA, including project background, efforts to identify historic properties potentially affected by the proposed GNTL project to date, a preliminary list of potentially affected historic properties listed or eligible for listing on the National Register of Historic Properties (NRHP), potential consulting parties. This letter also discusses DOE's initial proposal for direct and indirect Areas of Potential Effect (APEs) to be used in the Department's proposed phased approach to identification and evaluation of historic resources under Section 106. Furthermore, DOE is sending this letter as its official request for initiation of Section 106 consultation under NHPA with the Minnesota State

Historic Preservation Office (SHPO), and would appreciate your written reply within 30-days or as soon as possible.

Background

As you are aware, DOE sent a NEPA review information letter to your office on July 10, 2014, indicating that Minnesota Power applied to DOE for a Presidential permit to construct, operate, maintain, and connect an approximately 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota - Manitoba border crossing northwest of Roseau, Minnesota, and terminating at the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility.

DOE is a federal joint lead agency with the Minnesota Department of Commerce – Energy Environmental Review and Analysis (DOC-EERA) acting as state joint lead agency per 40 CFR 1501.5(b) in the preparation of the subject EIS. The U.S. Army Corps of Engineers, St. Paul District (USACE), the U.S. Fish and Wildlife Service, and the U.S. Environmental Protection Agency, Region 5, will be cooperating agencies to DOE and DOC-EERA in the preparation of this EIS.

DOE is the lead federal agency for purposes of compliance with Section 106, in accordance with 36 CFR § 800.2(a)(2), and will address the potential effects of the above identified NEPA cooperating agencies' (namely USACE's) proposed actions on historic and archaeological resources.

DOE documented a Notice of Intent (NOI) to prepare an EIS in the *Federal Register* on June 27, 2014 (79 FR 36493), with an open public scoping period which ended on August 15, 2014. The NOI specifically indicated that cultural and historic resources are being analyzed as part of the federal environmental review. While the proposed federal action (and undertaking) is the potential grant of a Presidential permit by DOE for the international border crossing, the proposed construction, operation, maintenance, and connection of the portion of the transmission line within the United States is a connected action to DOE's proposed action under NEPA. DOE is therefore analyzing the potential environmental impacts from the proposed federal action and the connected action in the EIS. For the purposes of compliance with Section 106 of the NHPA, DOE is considering the potential for adverse effects to cultural and historic properties for the proposed border crossing and entire length of the proposed transmission line.

Consulting Parties

In accordance with 36 CFR §800.2, DOE has identified potential consulting parties, including ACHP, SHPO, THPOs, the Applicant, local government representatives, other Native American entities, local historical societies, heritage preservation commissions, state

agencies, sites and museums, state-wide groups, national groups, and private individuals with a for the purposes of Section 106 consultation under NHPA. A list of consulting parties identified by DOE is enclosed with this letter for your review and input (*see enclosed Draft List of GNTL Section 106 Consulting Parties)*. DOE requests that you and your staff provide the Department with feedback regarding any other potential Section 106 consulting parties for the GNTL project that may not have yet been identified or that should be included in this list of potential consulting parties. Your office's assistance in this matter at this time is greatly appreciated.

Tribal Outreach and Consultation

As proposed, the GNTL project does not directly involve tribal reservation lands or require a right-of-way grant or special use grant from tribes, however, the proposal is located in an area that was inhabited by numerous American Indians before Euro-American settlement. As a result the proposal has the potential to impact tribes with current or historic interest in the project area.

In accordance with its responsibilities under Section 106, NEPA, the American Indian Religious Freedom Act (16 U.S.C. 1996), the Archeological Resources Protection Act of 1979 (16 U.S.C. 470aa-mm), the Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3001, et. seq.), Executive Order 13175 *Consultation and Coordination with Indian Tribal Governments*, (November 6, 2000), and DOE's "American Indian and Alaska Native Tribal Government Policy," as set forth in DOE Order 1230.2 (October 2000), DOE initiated government-to-government consultation with tribes potentially affected by the proposed GNTL project via letter dated June 27, 2014. As a part of this effort, DOE held government-to-government tribal consultation meetings on July 15, 2014, in Red Lake, Minnesota, and on July 22, 2014, in Deer River, Minnesota. The purpose of these initial consultation meetings was to gain the opinions of tribes regarding the cultural values that tribes ascribe to the area and its resources, as well as to identify opinions of tribes that no longer live in the area.

A list of federally recognized American Indians and Tribal Historic Preservation Officers (THPOs) contacted by DOE as a part of these activities is provided in the attached *Draft List of GNTL Section 106 Consulting Parties*. DOE's government-to-government consultation activities with these tribes and THPOs are on-going.

Identification Efforts to Date

The proposed undertaking has the potential to affect historic properties either listed in, or eligible for, inclusion in the National Register of Historic Places. An initial cultural resources survey (i.e., desktop literature review) was performed by Minnesota Power as part of the GNTL project Presidential permit application to DOE. This survey considered a study area extending 1-mile on each side of the proposed GNTL Project's right-of-way (ROW) centerline, with preliminary potential direct effects analysis based on an anticipated 200-foot-wide ROW within 1000-3000 foot Route Alternatives.

The initial cultural resources survey study area encompassed two Route Alternatives and four (4) Segment Options. The Route Alternatives are the Blue Route and the Orange Routes. Segment Options include the Segment Option C1, Segment Option C2, Segment Option J1, and Segment Option J2 (*see enclosed Cultural Resources Study).*

As a part of this effort, your office responded to historic resources data (e.g., GIS shape files) requests by Minnesota Power in March 2013, July 2013, August 2013, and November 2013. Your office also provided input to Minnesota Power regarding the proposed GNTL project and suggestions for archaeological survey via a letter dated August 14, 2013.

An initial study of the NHRP listed or eligible properties found that one of the properties identified within 1-mile of the Blue Route is listed on the NRHP, however, four properties, all railroad or mining properties, are considered eligible for NRHP listing: the Great Northern Railway Gunn Line (IC-IRT-009), one segment of the Duluth, Missabi and Northern Railway (IC-IRT-010), the Holman Mine Stripping and Lean Ore Dump (IC-IRT-012), and the Brown Number 2 Mine Stripping Dump (IC-IRT-013).

The study also found that no properties identified within 1-mile of the Orange Route are listed on the NRHP, however, four properties, all railroad or mining properties, are considered eligible for NRHP listing: the Great Northern Railway Gunn Line (IC-IRT-009), one segment of the Duluth, Missabe and Northern Railway (IC-IRT-010), the Holman Mine Stripping and Lean Ore Dump (IC-IRT-012), and the Brown Number 2 Mine Stripping Dump (IC-IRT-013).

For the Segment Options C1, C2, and J1, this study indicated that there are no NRHP listed or eligible properties within the CR Study Area. While none of the properties identified within the Segment Option J2 CR Study Area are listed on the NRHP, two architectural properties within the CR Study Area have been evaluated as eligible for listing on the NRHP: two segments of Minnesota Highway 38 (IC-BFT-017 and IC-EFC- 015).

The GNTL Presidential permit application, including associated maps, drawings, and initial cultural resources study, can also be viewed or downloaded in its entirety from the DOE Office of Electricity Delivery and Energy Reliability (OE) program Web site at: http://energy.gov/oe/downloads/application-presidential-permit-oe-docket-no-pp-398-great-northern-transmission-line. However, I have attached "Appendix G- Cultural Resources Study" submitted as part of Minnesota Power's Presidential permit application to this letter for your use and review.

In addition to efforts by Minnesota Power to identify historic resources potentially affected by the proposed GNTL project, DOE held eight NEPA public scoping meetings during its 45-day public scoping comment period from July 16 – July 24, 2014 (*see enclosed GNTL Regional Map)*. The meetings held in the towns of Roseau, Baudette, Littlefork, International Falls, Kelliher, Bigfork, and Grand Rapids, Minnesota. DOE received four comments related to potential impacts from construction on historic resources along the proposed transmission routes, including such resources as the Conservation Corps Camp 53 site, historic logging sites, and Big Fork River historic and cultural areas. The *Great Northern Transmission Line Scoping Summary Report* (November 2014) is available on the DOE GNTL EIS Web site at: http://www.greatnortherneis.org/Files/ScopingSummaryReportNOV2014.pdf. Due to its overall size, a hardcopy of this report will be provided to you upon request in follow up to this letter.

Scope of Future Identification Efforts under Section 106–Area of Potential Effect (APE)

As mentioned above, the anticipated ROW for the proposed GNTL project is 200-foot-wide alignment located within a 1000-3000 foot-wide route alternative. In order to begin your consideration of DOE's scope of identification efforts under Section 106 of the NHPA, the Department proposes a direct APE of the maximum width of a route alternative, an area of approximately 1000-3000 feet wide for each proposed Route Alternative. Using this as an initial point for scope of identification efforts (e.g., Phase 1A survey efforts) would allow for flexibility in siting of the final alignment within the approved route alternative. Once the final alignment is determined by the Minnesota Public Utilities Commission, DOE would propose a direct APE as the 200-foot wide alignment for detailed identification and evaluation efforts. The direct APE for identifying terrestrial historic properties and below grade archeological resources would include those areas outside of the ROW that may be impacted by construction, access roads, material and equipment storage areas, or any other physical disturbances necessary during construction of the project.

At this time, DOE would also like SHPO to contemplate the extent of an indirect APE for assessing the potential for adverse visual effects of the proposed GNTL project on terrestrial historic properties. The Department typically proposes an indirect APE for overhead transmission lines of this size and complexity to be approximately one-mile on either side of the center line (will vary with topography) of the proposed right-of-way once the final alignment is established. DOE looks forward to future discussions with you and other consulting parties about these proposed direct and indirect APEs for the GNTL project, and understands that no final direct and indirect APE determinations may be made at this time.

DOE Identification of Historic Properties – Programmatic Agreement (PA)

Because DOE is currently considering alternatives under NEPA for the proposed GNTL project that are large linear tracts of land encompassed in Minnesota Power's proposed Blue and Orange Route Alternatives and four Route Segment Options (C1, C2, J1, and J2), DOE has determined that a phased approach for Section 106 identification and evaluation efforts in accordance with the process set forth in 36 CFR §800.4(b)(2) is appropriate. The Department therefore proposes the execution of a programmatic agreement (PA) pursuant to 36 CFR §800.14(b) to properly defer final identification and evaluation of historic properties. A programmatic agreement for the GNTL project would delineate the process by which the likely presence of historic properties within the APE for each alternative under consideration through background research, consultation, and appropriate level of field investigation is performed, while taking into consideration the magnitude of the undertaking and its likely effects, and the views of SHPO, THPO(s) and any other consulting.

DOE has attached a preliminary draft PA for the GNTL project to this letter for your review and consideration. This preliminary draft PA is offered as a starting point for Section 106 consultation discussions with SHPO and consulting parties in considering DOE's proposed phased approach to identification and evaluation of historic and cultural properties potentially affected by the proposed GNTL project (*see enclosed Preliminary Draft PA).*

In close, DOE currently seeks your concurrence on initiating its Section 106 consultation process for the proposed Great Northern Transmission Line project. DOE also seeks any

information or suggestions that your office may have with regard to potential consulting parties or tribes that are included in the attached consulting parties list, or if you have additional information that should considered at this time. Please provide your Section 106 initiation concurrence and any material information that you may have in writing so that it may be added to the administrative record to evidence DOE's compliance with Section 106 consultation responsibilities.

I very much look forward to working with you and your staff in the near future and appreciate your assistance in this effort. I will be traveling on GNTL project business to St. Paul from December 2-4, 2014, and would like to have an opportunity to introduce myself in person to you and your staff. I hope there will be time in your schedule and staff resources for this meeting to occur, and will be in contact with your staff via email and/or phone in an effort to schedule such an opportunity if possible.

If you have any questions or concerns, please contact me at any time at Juliea.Smith@hq.doe.gov or (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Enclosed:

- GNTL Project Regional Map (from NEPA Scoping Summary Report)
- Cultural Resources Study (Appendix G from DOE Presidential permit application)
- Draft List GNTL Section 106 Consulting Parties
- Preliminary Draft PA

Cc: Charlene Dwin Vaughn, Advisory Council on Historic Preservation

Appendix Q

USFWS and DOE Section 7 Consultation

Department of Energy
Washington, DC 20585

October 2, 2015

Lisa Mandell
U.S. Fish and Wildlife Service
4101 American Blvd. East
Bloomington, MN 55425

SUBJECT: Request for Consultation under Section 7 of the Endangered Species Act for the Great Northern Transmission Line Project

Dear Ms. Mandell:

The Department of Energy (DOE) Office of Electricity Delivery and Energy Reliability is responding to an application by Minnesota Power (Applicant) for a Presidential permit to construct, operate, maintain, and connect the proposed Great Northern Transmission Line (GNTL) Project. Enclosed is a Biological Assessment (BA) to initiate formal consultation under Section 7(a)(2) of the Endangered Species Act (ESA).

The BA has been prepared in accordance with the legal requirements set forth under regulations implementing Section 7 of the Federal Endangered Species Act (50 CFR 402; 16 U.S.C. 1536(c)). The description of the proposed GNTL Project in Section 2.0 includes measures and best management practices that would help avoid impacts on these species, including time of year restrictions, survey commitments prior to vegetation management actions (e.g., clearing), and avoidance of habitat. Section 6.0 of the BA provides a comprehensive analysis of impacts.

The DOE prepared the enclosed BA in support of the National Environmental Policy Act (NEPA) review of potential environmental impacts related to the proposed GNTL Project. This environmental review is also being conducted jointly with the state of Minnesota Department of Commerce – Energy and Environmental Regulatory Analysis (DOC-EERA) under the Minnesota Power Plan Siting Act (PPSA) in support of the Minnesota Public Utility's Commission Route Permit decision.

As described in the enclosed BA, the proposed GNTL Project would have no effect on the Poweshiek skipperling (*Oarisma Poweshiek)*, piping plover (*Charadrius melodus)*, or the western prairie fringed orchid (*Platanthera praeclara)*. In addition, the proposed GNTL Project may affect but is unlikely to adversely affect the gray wolf (Canis lupus), Canada lynx (*Lynx canadensis)*, and Sprague's pipit (*Anthus spragueii)*. However, the proposed GNTL Project may affect, and is likely to adversely affect, the Northern long-eared bat (*Myotis septentrionalis)*, as well as may affect, and is likely to adversely affect critical habitat designated for the Northern long-eared bat and gray wolf. Therefore, DOE requests formal consultation under Section 7 of the ESA be initiated at this time.

Please feel free to contact me at any time either by email at Juliea.Smith@hq.doe.gov or by phone at (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Attch:

- GNTL Biological Assessment

Department of Energy
Washington, DC 20585

5 November 2014

Tony Sullins, Chief
Endangered Species Program
Midwest Region Ecological Services Office
U.S. Fish and Wildlife Service
5600 American Blvd. West, Suite 990
Bloomington, MN 55437-1458

SUBJECT: Proposed Great Northern Transmission Line Project

Dear Mr. Sullins:

The purpose of this letter is to initiate informal consultation under Section 7(a)(2) of the Endangered Species Act (ESA) for the proposed Great Northern Transmission Line (GNTL) Project. On April 15, 2014, Minnesota Power applied to DOE's Office of Electricity Delivery and Energy Reliability for a Presidential permit proposes to construct, operate, maintain, and connect a 220-mile, overhead, single-circuit 500 kV AC transmission line between the Minnesota-Manitoba border crossing northwest of Roseau, Minnesota, and the existing Blackberry 230/115 kV Substation near Grand Rapids, Minnesota. The Minnesota Power's proposal also includes associated substation facilities and transmission system modifications at the Blackberry Substation site, and construction of a new 500 kV Series Compensation Station (a structure which will house the 500 kV series capacitor banks necessary for reliable operation and performance of the proposed transmission line). A new Blackberry 500 kV Substation would be required for the proposed GNTL Project and would be constructed adjacent to and east of the existing Blackberry 230/115 kV Substation. The proposed GNTL Project would carry hydropower generated by facilities operated by Manitoba Hydro, a Canadian electric utility, and would support the regional electric grid.

DOE has determined that an Environmental Impact Statement (EIS) is the appropriate level of review under the National Environmental Policy Act (NEPA) for this proposed project, as was documented in our *Federal Register* Notice of Intent (NOI) to prepare an EIS on June 27, 2014 (79 FR 36493), with an open public scoping period ending on August 11, 2014. The proposed federal action is the potential grant of a Presidential permit for the international border crossing. The proposed construction, operation, maintenance, and connection of the portion of the transmission line within the United States is a connected action to DOE's proposed action. DOE will analyze potential environmental impacts from the proposed federal action and the connected action in the EIS. The NOI, along with background information, an opportunity to subscribe to our mailing list, and more, are available at http://www.GreatNorthernEIS.org.

The Great Northern Transmission Line Presidential permit application (OE Docket PP-398), including associated maps, drawings, and initial threatened and endangered species identification study, can also be viewed or downloaded in its entirety from the DOE Office of Electricity Delivery and Energy Reliability (OE) program Web site at:
http://energy.gov/oe/downloads/application-presidential-permit-oe-docket-no-pp-398-great-northern-transmission-line.

In preparation of their Presidential permit, Minnesota Power collected unique and protected species information from the Minnesota Department of Natural Resources (DNR) Minnesota Biological Survey (MBS), Minnesota's Comprehensive Wildlife Conservation Strategy, USGS Gap Analysis Program (GAP) analysis, and other sources to identify habitats and species that could occur within or near the Study Area. The threatened and endangered species (including protected and candidate species) under the jurisdiction of the USFWS that are potentially located in the GNTL Project area include, but may not be limited to:

1. Canada lynx (lynx Canadensis)
2. Piping plover (Charadrius melodus)
3. Western prairie fringed orchid (Platanthera praeclara)
4. Sprague's pipit (Anthus spragueii)
5. Dakota skipper (Hesperia dacotae)
6. Poweshiek skipperling (Oarisma poweshiek)
7. Northern long-eared bat (Mytosis septentrionalis)

We would very much appreciate USFWS Endangered Species Program's review and approval of the above-listed potentially affected species, or request that your program provide DOE with a list of additional protected species that might be affected and any concerns relative to potential impacts of the proposed GNTL Project on federally-listed species.

DOE has also been engaged with the USFWS Twin Cities Field Office staff, and the field office is acting as a cooperating agency in the development of the EIS. We look forward to hearing from your office and to working with you and USFWS staff with regard to the proposed GNTL Project. Please feel free to contact me at any time either by e-mail at Juliea.Smith@hq.doe.gov or by phone at (202) 586-7668.

Yours very truly,

Julie A Smith

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Cc:
Lisa Mandell, USFWS
Margaret Rheude, USFWS
Brian Mills, DOE NEPA Compliance Officer

Appendix R

Biological Assessment

Department of Energy
Washington, DC 20585

October 2, 2015

Lisa Mandell
U.S. Fish and Wildlife Service
4101 American Blvd. East
Bloomington, MN 55425

SUBJECT: Request for Consultation under Section 7 of the Endangered Species Act for the Great Northern Transmission Line Project

Dear Ms. Mandell:

The Department of Energy (DOE) Office of Electricity Delivery and Energy Reliability is responding to an application by Minnesota Power (Applicant) for a Presidential permit to construct, operate, maintain, and connect the proposed Great Northern Transmission Line (GNTL) Project. Enclosed is a Biological Assessment (BA) to initiate formal consultation under Section 7(a)(2) of the Endangered Species Act (ESA).

The BA has been prepared in accordance with the legal requirements set forth under regulations implementing Section 7 of the Federal Endangered Species Act (50 CFR 402; 16 U.S.C. 1536(c)). The description of the proposed GNTL Project in Section 2.0 includes measures and best management practices that would help avoid impacts on these species, including time of year restrictions, survey commitments prior to vegetation management actions (e.g., clearing), and avoidance of habitat. Section 6.0 of the BA provides a comprehensive analysis of impacts.

The DOE prepared the enclosed BA in support of the National Environmental Policy Act (NEPA) review of potential environmental impacts related to the proposed GNTL Project. This environmental review is also being conducted jointly with the state of Minnesota Department of Commerce – Energy and Environmental Regulatory Analysis (DOC-EERA) under the Minnesota Power Plan Siting Act (PPSA) in support of the Minnesota Public Utility's Commission Route Permit decision.

As described in the enclosed BA, the proposed GNTL Project would have no effect on the Poweshiek skipperling (*Oarisma Poweshiek)*, piping plover (*Charadrius melodus)*, or the western prairie fringed orchid (*Platanthera praeclara)*. In addition, the proposed GNTL Project may affect but is unlikely to adversely affect the gray wolf (Canis lupus), Canada lynx (*Lynx canadensis)*, and Sprague's pipit (*Anthus spragueii)*. However, the proposed GNTL Project may affect, and is likely to adversely affect, the Northern long-eared bat (*Myotis septentrionalis)*, as well as may affect, and is likely to adversely affect critical habitat designated for the Northern long-eared bat and gray wolf. Therefore, DOE requests formal consultation under Section 7 of the ESA be initiated at this time.

Please feel free to contact me at any time either by email at Juliea.Smith@hq.doe.gov or by phone at (202) 586-7668.

Yours very truly,

Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
U.S. Department of Energy

Attch:

- GNTL Biological Assessment

Great Northern Transmission Line

Biological Assessment

Prepared for
U.S. Department of Energy
Office of Electricity Delivery and Energy Reliability

October, 2015

Great Northern Transmission Line

Biological Assessment

Prepared for
U.S. Department of Energy
Office of Electricity Delivery and Energy Reliability

October, 2015

Great Northern Transmission Line

Biological Assessment

October, 2015

Contents

Summary 1
1.0 Introduction 3
1.1 Endangered Species Act Requirements 5
1.2 Consultation History 6
2.0 Description of the Proposed Action 7
2.1 Description of Alternatives Used in the Draft EIS Analysis 7
2.2 Associated Facilities 8
2.3 Action Area and Study Area 8
2.4 Construction 8
2.4.1 Transmission Line 8
2.4.1.1 Vegetation Clearing 12
2.4.1.2 Construction Methodology 13
2.4.1.3 Restoration/Re-vegetation 14
2.4.2 Substation 15
2.4.3 500 kV Series Compensation Station 15
2.4.4 Regeneration Stations 15
2.4.5 Permanent Access Roads 16
2.4.6 Temporary Access Roads, Laydown Areas, and Fly-in Sites 16
2.5 Maintenance and Operation 16
2.5.1 Transmission Line 16
2.5.2 Substation 17
2.5.3 500 kV Series Compensation Station 17
2.5.4 Regeneration Stations 17
2.5.5 Permanent Access Roads 17
2.6 Construction and Schedule 18
2.7 Impact Minimization and Conservation Measures 18
2.7.1 Applicant–Proposed Avoidance and Minimization Measures 18
3.0 No Action Alternative 20

4.0 Federally-Listed Species and Designated Critical Habitat 21
4.1 Poweshiek Skipperling 22
4.1.1 Behavior and Life History 22
4.1.2 Distribution and Habitat 24
4.1.3 Threats 24
4.1.4 Occurrence in the Proposed Project Area 24
4.1.5 Determination of Effects 24
4.2 Gray Wolf 24
4.2.1 Behavior and Life History 25
4.2.2 Distribution and Habitat 25
4.2.3 Threats 26
4.2.4 Occurrence in the Proposed Project Area 26
4.2.5 Determination of Effects 26
4.3 Piping Plover 26
4.3.1 Behavior and Life History 26
4.3.2 Distribution and Habitat 27
4.3.3 Threats 27
4.3.4 Occurrence in the Proposed Project Area 27
4.3.5 Determination of Effects 27
4.4 Canada Lynx 28
4.4.1 Behavior and Life History 28
4.4.2 Distribution and Habitat 28
4.4.3 Threats 29
4.4.4 Occurrence in the Proposed Project Area 29
4.4.5 Determination of Effects 29
4.5 Northern Long-Eared Bat 30
4.5.1 Behavior and Life History 30
4.5.2 Distribution and Habitat 30
4.5.3 Threats 31
4.5.4 Occurrence in the Proposed Project Area 31
4.5.5 Determination of Effects 32
4.6 Western Prairie Fringed Orchid 32
4.6.1 Behavior and Life History 32
4.6.2 Distribution and Habitat 32
4.6.3 Threats 32

4.6.4 Occurrence in the Proposed Project Area 33
4.6.5 Determination of Effects 33
4.7 Sprague's Pipit 33
4.7.1 Behavior and Life History 33
4.7.2 Distribution and Habitat 33
4.7.3 Threats 34
4.7.4 Occurrence in the Proposed Project Area 34
4.7.5 Determination of Effects 34
5.0 Environmental Baseline Conditions 35
5.1 West Section 35
5.2 Central Section 37
5.3 East Section 37
6.0 Potential Effects on Federally-Listed Species 39
6.1 Gray Wolf 40
6.1.1 Construction Impacts 40
6.1.2 Operations and Maintenance Impacts 41
6.2 Canada Lynx 41
6.2.1 Construction Impacts 41
6.2.2 Operations and Maintenance Impacts 42
6.3 Northern Long-Eared Bat 42
6.3.1 Construction Impacts 42
6.3.2 Operations and Maintenance Impacts 42
6.4 Sprague's Pipit 43
6.4.1 Construction Impacts 43
6.4.2 Operations and Maintenance Impacts 43
7.0 Cumulative Effects 44
7.1 Summary of Cumulative Effects 46
8.0 Conclusions 47
8.1 Effects Determination for Federally-Listed Species 47
8.2 Effects Determination for Critical habitat 47
9.0 References 48
10.0 Acronyms 51

List of Tables

Table 1 Determination of Effect for Federally- Listed Species and Designated Critical Habitat Potentially Affected by the Proposed Project 2
Table 2 Nearby Federally-Listed Species and Designated Critical Habitat Not Affected by the Proposed Project 2
Table 3 Geographic Sections and Corresponding Variation Areas 7
Table 4 Likelihood of Occurrence of Federally-Listed Species within Geographic Sections 22
Table 5 Determination of Effect for Federally- Listed Species and Designated Critical Habitat Potentially Affected by the Proposed Project 40

List of Figures

Figure 1 Structure Schematics 12

List of Maps

Map 1 Project Overview 4
Map 2 West Section Overview 9
Map 3 Central Section Overview 10
Map 4 East Section Overview 11
Map 5 Critical Habitat Areas 23
Map 6 Ecological Subsections 36

Summary

Minnesota Power, a regulated utility division of ALLETE, Inc., as the Applicant for a Presidential permit, proposes to develop the Great Northern Transmission Line Project (proposed Project) to connect renewable sources of power generation (hydroelectric) in Manitoba, Canada to northern Minnesota. This hydroelectric power would be used to off-set projected energy shortages across the region in northern Minnesota by 2020 and to complement the Applicant's wind energy investments in North Dakota. The Applicant estimates the total capital cost for the proposed Project would be between $558 million and $710 million (2013 dollars) and is projected to be in service by 2020. The Applicant estimates that the proposed Project would create 120 direct construction jobs during the approximate 4-year construction period.

The proposed Project would run from the Applicant's proposed international border crossing in Roseau County, Minnesota to the proposed Iron Range 500 kV Substation located just east of the existing Blackberry Substation near Grand Rapids, Minnesota. It would be located on all new 200-foot wide right of way (ROW) with a wider area required for certain spans at angle and corner structures, for guyed structures, or where special design requirements are dictated by topography. The proposed Iron Range 500 kV Substation would accommodate the required 500 kV interconnection. The Applicant is also proposing to construct a new 500 kV series compensation station, regeneration stations, permanent access roads, temporary access roads, laydown areas, and fly-in sites. The proposed Project would be owned and operated in the United States by the Applicant.

This Biological Assessment (BA) has been prepared in accordance with the legal requirements set forth under regulations implementing Section 7 of the Federal Endangered Species Act (ESA) (50 CFR 402; 16 U.S.C. 1536(c)). The purpose of this BA is to review the proposed Project in sufficient detail to determine if the proposed action may affect any federally threatened or endangered species and/or critical habitat.

Based on the description of the proposed Project in Section 2 of this BA and further described in the associated Environmental Impact Statement (EIS) (Department of Energy (DOE) 2015), the status of potentially affected federally-listed species in Section 4 of this BA, environmental baseline conditions in Section 5 of this BA, and the analysis of potential impacts in Section 6 of this BA, DOE concludes determinations of effect for the species and designated critical habitat that occur in the proposed Project area as identified in Table 1. Similarly, DOE concludes that the proposed Project would have no effect on the species and designated critical habitat identified in Table 2.

Table 1 Determination of Effect for Federally- Listed Species and Designated Critical Habitat Potentially Affected by the Proposed Project

Scientific Name	Common Name	ESA Status[1]	Determination of Effect
Canis lupus	Gray wolf	T	May affect, but not likely to adversely affect
Lynx canadensis	Canada lynx	T	May affect, but not likely to adversely affect
Myotis septentrionalis	Northern long-eared bat	T	May affect, likely to adversely affect
Anthus spragueii	Sprague's pipit	Can.	May affect, but not likely to adversely affect
Designated Critical Habitat			**Determination of Effect**
Canis lupus (gray wolf)			May affect, likely to adversely affect

(1) Endangered Species Act. "E" refers to federally-listed as endangered, "T" refers to federally-listed as threatened, "Can" refers to federal candidate species.

Table 2 Nearby Federally-Listed Species and Designated Critical Habitat Not Affected by the Proposed Project

Scientific Name	Common Name	ESA Status[1]
Oarisma poweshiek	Poweshiek skipperling	E
Charadrius melodus	Piping plover	T
Platanthera praeclara	Western prairie fringed orchid	T
Designated Critical Habitat		
Lynx canadensis	Canada lynx	T
Charadrius melodus	Piping plover	T
Oarisma poweshiek[2]	Poweshiek skipperling	E

(1) Endangered Species Act. "E" refers to federally-listed as endangered, "T" refers to federally-listed as threatened, "Can" refers to federal candidate species.

(2) The U.S. Fish and Wildlife Service (USFWS) proposed designated critical habitat for Poweshiek skipperling October 24, 2013 in portions of Minnesota, Iowa, Michigan, Wisconsin, and the Dakotas.

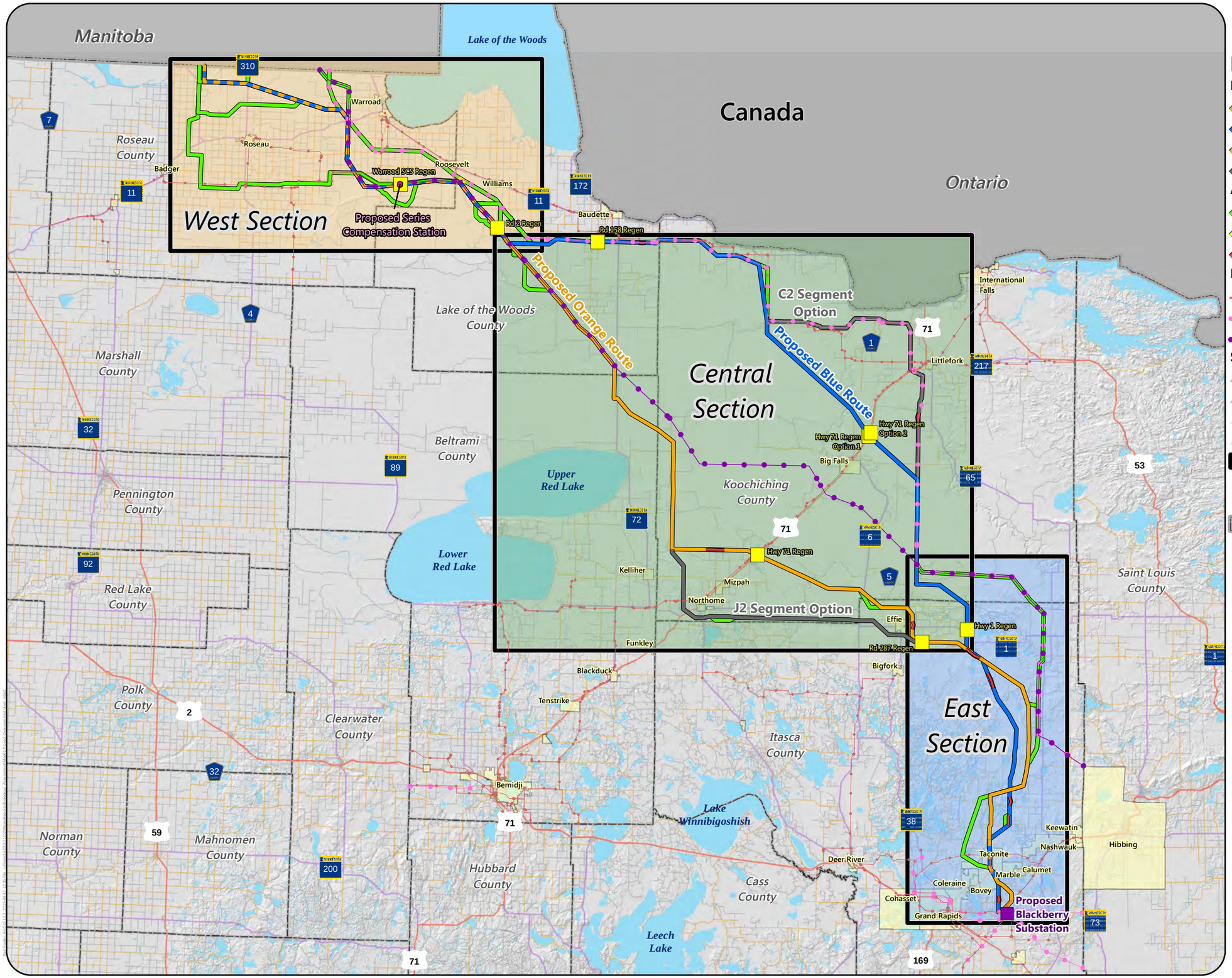
1.0 Introduction

The purpose of this Biological Assessment (BA) is to evaluate the potential impacts of the proposed Great Northern Transmission Line Project (proposed Project) on federally-listed threatened or endangered species, and to comply with requirements of the Endangered Species Act (ESA) of 1973 (16 United States Code [U.S.C.] 1531-1534). The proposed Federal Action by the U.S. Department of Energy (DOE) is the issuance of a Presidential permit that would authorize Minnesota Power, a regulated utility division of ALLETE, Inc. (the Applicant) to construct, operate, and maintain the proposed Project crossing of the United States/Canada international border.

DOE has prepared an Environmental Impact Statement (EIS) for the proposed Project (DOE 2015) to comply with requirements of the National Environmental Policy Act. Therefore, DOE is preparing this BA as the lead Federal Action Agency for the proposed Project. The EIS contains additional details about the proposed Project and potential effects on the natural and human environment, and is incorporated into this BA by reference. The U.S. Army Corps of Engineers will evaluate potential impacts to navigable waters by the Federal Action and determine if issuance of a Clean Water Act Section 404 permit for the proposed Project is warranted. Other cooperating agencies involved with the EIS process include the U.S. Fish and Wildlife Service (USFWS), U.S. Environmental Protection Agency, the Minnesota Department of Natural Resources (MnDNR), and the Red Lake Band of Chippewa Indians.

The Applicant proposed to develop the Project to connect renewable sources of power generation (hydroelectric) in Manitoba, Canada to northern Minnesota. This hydroelectric power would be used to off-set projected energy shortages across the region in northern Minnesota by 2020 and to complement the Applicant's wind energy investments in North Dakota. The Applicant estimates the total capital cost for the proposed Project would be between $558 million and $710 million (2013 dollars) and is projected to be in service by 2020. The Applicant estimates that the proposed Project would create 120 direct construction jobs during the approximate 4-year construction period.

The proposed Project would travel from the Applicant's proposed international border crossing in Roseau County, Minnesota to the proposed Iron Range 500 kV Substation located just east of the existing Blackberry Substation near Grand Rapids, Minnesota (Map 1). It would be located on all new 200-foot wide right of way (ROW) with a wider area required for certain spans at angle and corner structures, for guyed structures, or where special design requirements are dictated by topography. The transmission towers would be steel lattice structures for the majority of the route, with the exact type of structure in any given location dependent on land type, land use, and potential effect on the surrounding landscape. Tower heights would range from approximately 100 feet to about 170 feet. In some instances, such as where the proposed Project crosses an existing transmission line, taller structures would be required. The proposed Iron Range 500 kV Substation would accommodate the required 500 kV interconnection. The Applicant is also proposing to construct a new 500 kV series compensation station, regeneration stations, permanent access roads, temporary access roads, laydown areas, and fly-in sites. The proposed Project would be owned and operated in the United States by the Applicant.



Proposed Regeneration Site Location
Proposed Blackberry Substation Location
Proposed Series Compensation Station

Proposed Routes
- Blue/Orange Route
- Blue Route
- Orange Route
- Segment Option

Alternatives
- Route Variation
- Route Variation Hop
- Alignment Modification

Existing Transmission Lines
- 69 or 115 kV
- 230 kV
- 500 kV

Streets and Highways
- US Highway
- State Trunk Highway
- County State Aid Highway
- Local Road
- Project Section
- Municipal Boundary
- County Boundary
- International Boundary

PROJECT OVERVIEW
Great Northern Transmission Line
Biological Assessment

On April 15, 2014, the Applicant applied to the DOE for a Presidential permit for the proposed Project pursuant to Executive Order (EO) 10485, as amended by Executive Order 12038, and the regulations codified at 10 Code of Federal Regulations (CFR) Part 205.320 et seq. (2000), "Application for Presidential Permit Authorizing the Construction, Connection, Operation, and Maintenance of Facilities for Transmission of Electric Energy at International Boundaries." On the same date, the Applicant also applied to the Minnesota Public Utilities Commission (MN PUC) for a Route Permit under the Minnesota Power Plant Siting Act. The proposed transmission line would run from the Applicant's proposed international border crossing in Roseau County, Minnesota to the proposed Iron Range 500 kV Substation located just east of the existing Blackberry Substation near Grand Rapids, Minnesota.

On October 29, 2014, the Applicant submitted an amendment to their Presidential permit and Route Permit applications to DOE and MN PUC, respectively, for the proposed Project as a result of new information. The amended Presidential permit application changed the location of the proposed international border crossing under DOE's consideration to latitude 49 00 00.00 N and longitude 95 54 50.49 W, roughly 2.9 miles east of Highway 89 in Roseau County, Minnesota. The proposed Project, as amended, is described in detail below in Section 2 of this BA.

1.1 Endangered Species Act Requirements

The ESA establishes procedures for the protection and conservation of threatened and endangered species and the ecosystems upon which they depend (i.e., designated critical habitat). The ESA describes several categories of federal status for plants and animals and their critical habitat, which have been designated by the USFWS. In addition to allowing the listing of species and subspecies, the ESA allows listing of "distinct population segments" (DPSs) of vertebrate species. A DPS is a portion of a species' or subspecies' population or range; DPS are defined geographically, rather than biologically.

An "endangered" species is defined as any species in danger of extinction throughout all or a large portion of its range. A "threatened" species is defined as any species likely to become an endangered species in the foreseeable future. A "candidate" species is defined as any species for which the USFWS has on file sufficient information on biological vulnerability and threat(s) to support issuance of a proposal to list, but issuance of a proposed rule is currently precluded by higher priority listing actions. "Critical habitat" is defined in the ESA as "a specific geographic area that is essential for the conservation of a threatened or endangered species and that could require special management or protection." Critical habitat can include an area that is not occupied by a species but is needed for the recovery of that species.

The USFWS has the responsibility for implementing the ESA. Federal agencies must consult with the USFWS, under Section 7(a)(2) of the ESA, on activities that may affect a federally-listed species. These interagency consultations, or Section 7 consultations, are designed to assist federal agencies in fulfilling their duty to ensure federal actions do not jeopardize the continued existence of a species or destroy or adversely modify critical habitat.

1.2 Consultation History

The following interactions between the DOE and the USFWS regarding the proposed Project have occurred prior to the preparation of this BA and have supported its development:

- March 14, 2014 – Letter from the USFWS to the Minnesota Department of Commerce (DOC) providing comments during the environmental impact statement (EIS) scoping process.
- August 4, 2014 – DOE met with USFWS and Minnesota Power in person to discuss the proposed transmission line and avoidance of USFWS interest lands.
- August 14, 2014 – Letter from USFWS to DOE providing comments on specific routing alternatives to be analyzed in the Draft EIS.
- November 5, 2014 – DOE sent letter to the USFWS initiating informal consultation under Section 7 of the ESA.
- March 3, 2015 – Email sent to the USFWS to request GIS data on Canada lynx and gray wolf.
- March 5, 2015 – Email response from the USFWS with wolf occupied township shapefile and wolf range shapefile attached.
- August 10, 2015 – Letter from USFWS to DOE providing comments on the Draft EIS during the public comment period.
- September 14, 2015 – DOE held a conference call with USFWS to discuss the initiation of formal consultation under Section 7 of the ESA.

2.0 Description of the Proposed Action

This section summarizes the key elements of the proposed Project, which was derived from the EIS (DOE 2015). The following items related to the proposed Project are defined and summarized in the sub-sections below: the alternatives considered and evaluated in the EIS, the Action Area and Study Area, details related to construction, maintenance, and operation, construction schedule, and impact and minimization and conservation measures.

2.1 Description of Alternatives Used in the Draft EIS Analysis

The proposed Project would include construction, operation, and maintenance of an approximately 220-mile long, 500-kilovolt (kV) overhead, single-circuit, alternating current (AC) electric transmission system. The Applicant identified two proposed routes; the Blue Route and the Orange Route, as identified on Map 1. Additional routing alternatives were developed during the proposed Project scoping process (see Appendix C in the EIS).

For purposes of understanding the routing alternatives associated with the proposed Project, and to facilitate the analysis in the EIS (DOE 2015), the proposed Project was divided into three geographical sections, including the West Section, Central Section, and East Section (Map 1). Within each geographical section, multiple "variation areas" were developed to address local issues across route alternatives or "variations." Each variation area contains portions of the Applicant's proposed route(s) and variations, which were developed from alternative route segments identified during the proposed Project scoping process (see Appendix C in the EIS). The EIS evaluated the potential environmental impacts and presents the results for the alternatives — proposed routes and variations — within each variation area.

Table 3 and Map 2 through Map 4 provide an overview of the geographic sections and the variation areas contained within them. Because potential effects on federally-listed species from the proposed Project would not differ between portions of the proposed routes and variations within a particular variation area, the BA does not go into detail on all route alternatives evaluated for the proposed Project. The EIS provides information on sections of the proposed routes, variations, and alignment modifications evaluated for the proposed Project (DOE 2015).

Table 3 Geographic Sections and Corresponding Variation Areas

Sections	Variation Areas
West Section (Roseau and Lake of the Woods counties)	Border Crossing Variation Area
	Roseau Lake WMA Variation Area
	Cedar Bend WMA Variation Area
	Beltrami North Variation Area
	Beltrami North Central Variation Area
Central Section (Lake of the Woods, Koochiching, Beltrami, and Itasca counties)	Pine Island Variation Area
	Beltrami South Central Variation Area
	Beltrami South Variation Area

Sections	Variation Areas
	North Black River Variation Area
	C2 Segment Option Variation Area
	J2 Segment Option Variation Area
	Northome Variation Area
	Cutfoot Variation Area
East Section (Koochiching and Itasca counties)	Effie Variation Area
	East Bear Lake Variation Area
	Balsam Variation Area
	Dead Man's Pond Variation Area
	Blackberry Variation Area

2.2 Associated Facilities

In addition to the proposed approximately 220-mile long, 500 kV overhead, single-circuit, AC electric transmission system, the Applicant also proposes a new Iron Range 500 kV Substation, located on the same site as the Applicant's existing Blackberry 230/115 kV Substation, adjacent to and east of the existing substation to accommodate the required 500 kV interconnection and to construct a new 500 kV series compensation station, and regeneration stations (Map 1). In addition, the Applicant would need to construct permanent access roads, temporary access roads, laydown areas, and fly-in sites; however, the detailed design and locations of these features would not be determined until the Presidential permit and Route Permit are issued by the DOE and Minnesota PUC, respectively.

2.3 Action Area and Study Area

The Action Area is defined in 50 CFR Part 402.02 as "all areas to be affected directly or indirectly by the Federal Action and not merely the immediate area involved in the action." The Action Area for federally-listed species in the proposed Project is 100 feet on either side of all proposed routes and variations, which is the anticipated ROW, and the footprints for the proposed Iron Range 500 kV Substation, new 500 kV series compensation station, and regeneration stations.

The Study Area for this BA includes all proposed routes and variations and associated facilities, as described above, plus a one-mile buffer around them.

2.4 Construction

The following subsections describe the specific engineering details of the transmission system and how the Applicant proposes to install and operate the transmission line and facilities for the proposed Project.

2.4.1 Transmission Line

The Applicant is evaluating several structure types and configurations, including a self-supporting lattice structure, a lattice guyed-V structure, and a lattice guyed-delta structure. It is currently estimated that 4 to 5 structures would be needed per mile of transmission line and the structures would be placed

Note:
This map only depicts proposed alignments. The Applicant will be issued a Route Permit with a specific route width.

Border Crossing Point

Proposed Routes

- Blue/Orange Route
- Blue Route
- Orange Route

Alternatives

- Route Variation
- Route Variation Hop

Existing Transmission Lines

- 69 or 115 kV
- 230 kV
- 500 kV
- State Forest Boundary
- Variation Area
- Project Section
- Municipal Boundary
- County Boundary
- International Boundary

Land Use/Land Cover

- Developed or Disturbed Land
- Forested and/or Swamp Land
- Great Plains Grassland & Shrubland
- Agricultural Land
- Introduced & Semi Natural Vegetation

Note:
Callout box provides longitude and latitude coordinates in NAD83 for each border crossing location

Border Crossing Pine Creek Variation (95° 55' 35.79" W, 49° 00' 00.00" N)

Proposed International Border Crossing (95° 54' 50.49" W, 49° 00' 00.00" N)

Border Crossing Highway 310 Variation (95° 46' 8.82" W, 49° 00' 00.00" N)

Border Crossing 500 kV Variation (95° 32' 23.96" W, 49° 00' 00.00" N)

Border Crossing 230 kV Variation (95° 30' 26.18" W, 49° 00' 00.00" N)

United States - Canada International Border

Lake of the Woods

Border Crossing Variation Area

Proposed Blue/Orange Route

Lost River State Forest

Roseau Lake WMA Variation 2

Warroad

Willow Creek

Cedar Bend WMA Variation

Cedar Bend WMA Variation Area

Roseau

Roseau Lake WMA Variation Area

Lake of the Woods State Forest

Roosevelt

Beltrami North Central Variation 3 & 4

Beltrami North Central Variation 1 & 5

Badger

Roseau Lake WMA Variation 1

Beltrami North Variation 1

Beltrami North Variation Area

Sucker Creek

Bear Creek

Williams

Beltrami North Central Variation Area

Roseau River

Severson Creek

Beltrami North Central Variation 4 & 5

Roseau County

Beltrami North Variation 2

Beltrami North Central Variation 1, 2 & 5

Paulson Creek

Beltrami North Central Variation 2

Beltrami Island State Forest

Hansen Creek

Beltrami North Central Variation 1 & 3

Beltrami North Central Variation 1, 2 & 3

South Fork Roseau River

Lake of the Woods County

Marshall County

Beltrami County

Miles

4.5 0 4.5

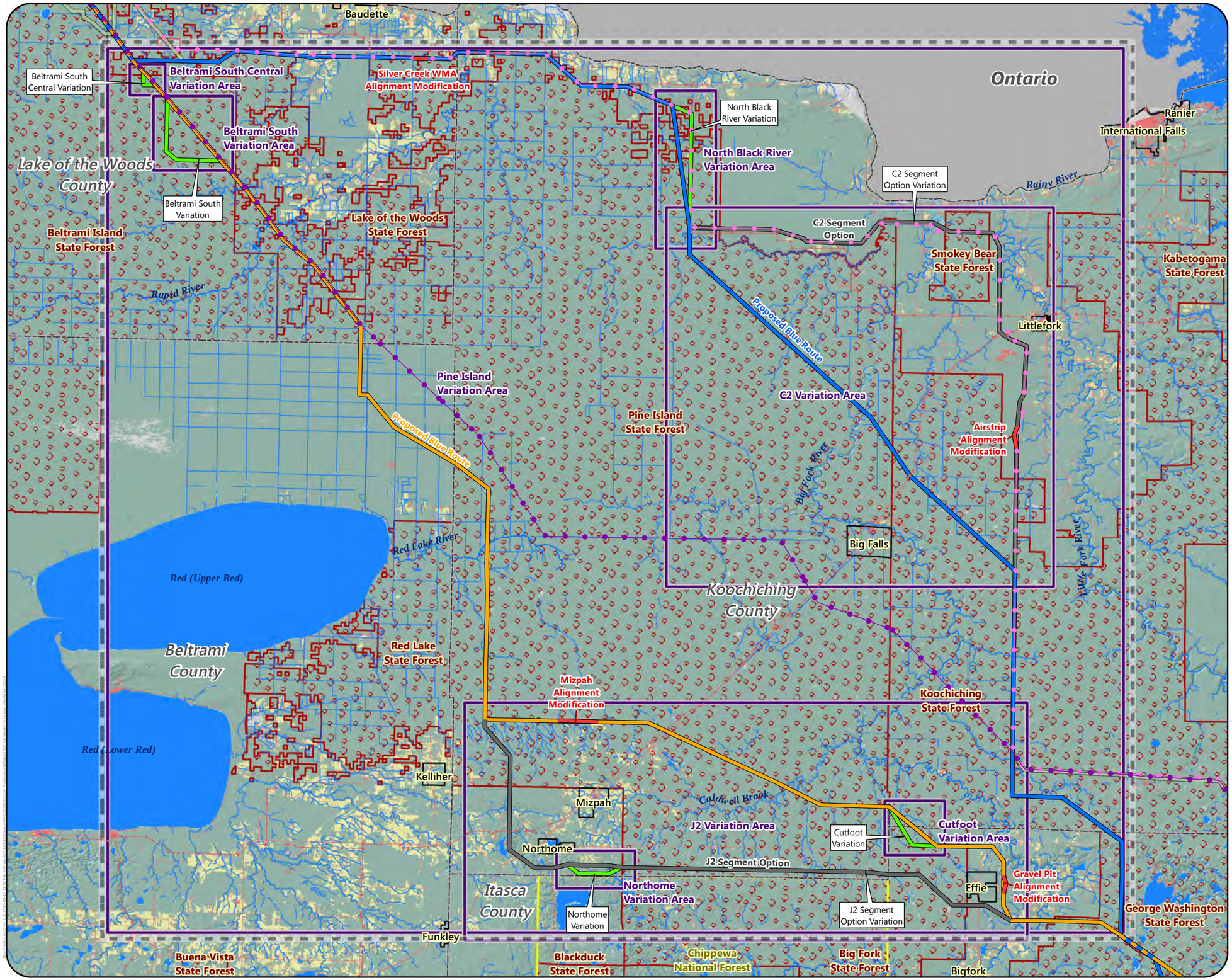
Map 2

WEST SECTION OVERVIEW

Great Northern Transmission Line
Biological Assessment

U.S. DEPARTMENT OF ENERGY

MINNESOTA DEPARTMENT OF COMMERCE



Proposed Routes
- Blue/Orange Route
- Blue Route
- Orange Route
- Segment Option

Alternatives
- Route Variation
- Alignment Modification

Existing Transmission Lines
- 69 or 115 kV
- 230 kV
- 500 kV
- State Forest Boundary
- National Forest Boundary
- Variation Area
- Project Section
- Municipal Boundary
- County Boundary

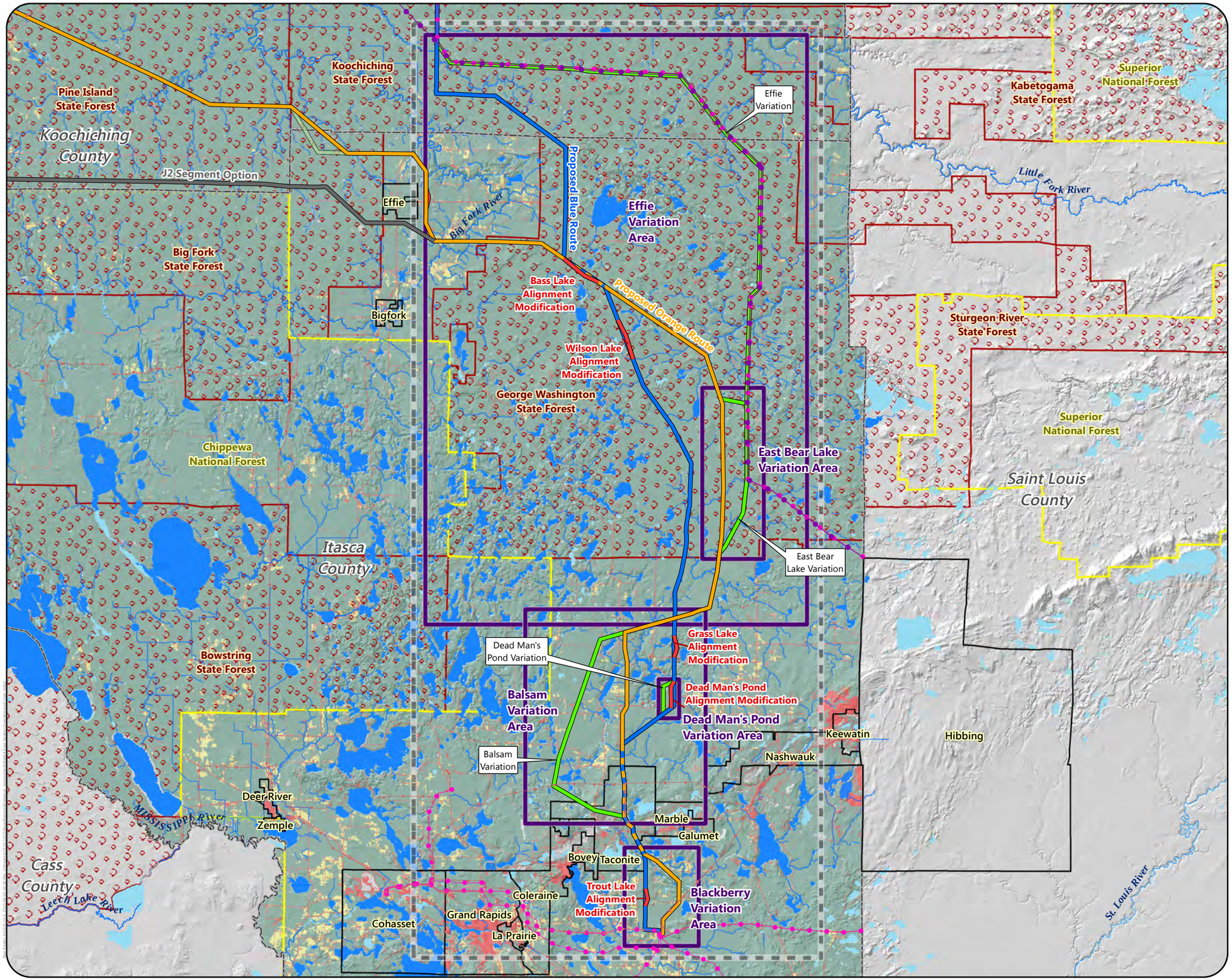
Land Use/Land Cover
- Developed or Disturbed Land
- Forested and/or Swamp Land
- Great Plains Grassland & Shrubland
- Agricultural Land
- Introduced & Semi Natural Vegetation

Miles
6.5 0 6.5

Map 3

CENTRAL SECTION OVERVIEW
Great Northern Transmission Line
Biological Assessment

U.S. DEPARTMENT OF ENERGY
MINNESOTA DEPARTMENT OF COMMERCE



Proposed Routes
- Blue/Orange Route
- Blue Route
- Orange Route
- Segment Option

Alternatives
- Route Variation
- Alignment Modification

Existing Transmission Lines
- 69 or 115 kV
- 230 kV
- 500 kV
- State Forest Boundary
- National Forest Boundary
- Variation Area
- Project Section
- Municipal Boundary
- County Boundary

Land Use/Land Cover
- Developed or Disturbed Land
- Forested and/or Swamp Land
- Great Plains Grassland & Shrubland
- Agricultural Land
- Introduced & Semi Natural Vegetation

Miles
5.5 0 5.5

Map 4

EAST SECTION OVERVIEW
Great Northern Transmission Line
Biological Assessment

U.S. DEPARTMENT OF ENERGY
MINNESOTA DEPARTMENT OF COMMERCE

approximately 1,000 to 1,700 feet apart, with a maximum span of 1,700 feet. The type of structure in any given location of transmission line would depend on land type and land use.

The structures would typically range in height from 100 to 170 feet, depending on the structure type and the terrain. In some instances, such as where the proposed Project crosses an existing transmission line, taller structures may be required. The structures would be placed approximately 1,200 to 1,700 feet apart, with a maximum span of 1,700 feet.

On cultivated land or in areas of intensive land use, the Applicant anticipates using self-supporting lattice structures. In other areas where guy wires would not significantly interfere with land use, the proposed Project may be installed on one of the guyed structure types. The area of permanent impact for guyed structures is anticipated to be 33 square feet per structure with a temporary construction disturbance footprint of approximately 0.92 acres per structure. Structure types are illustrated in Figure 1.

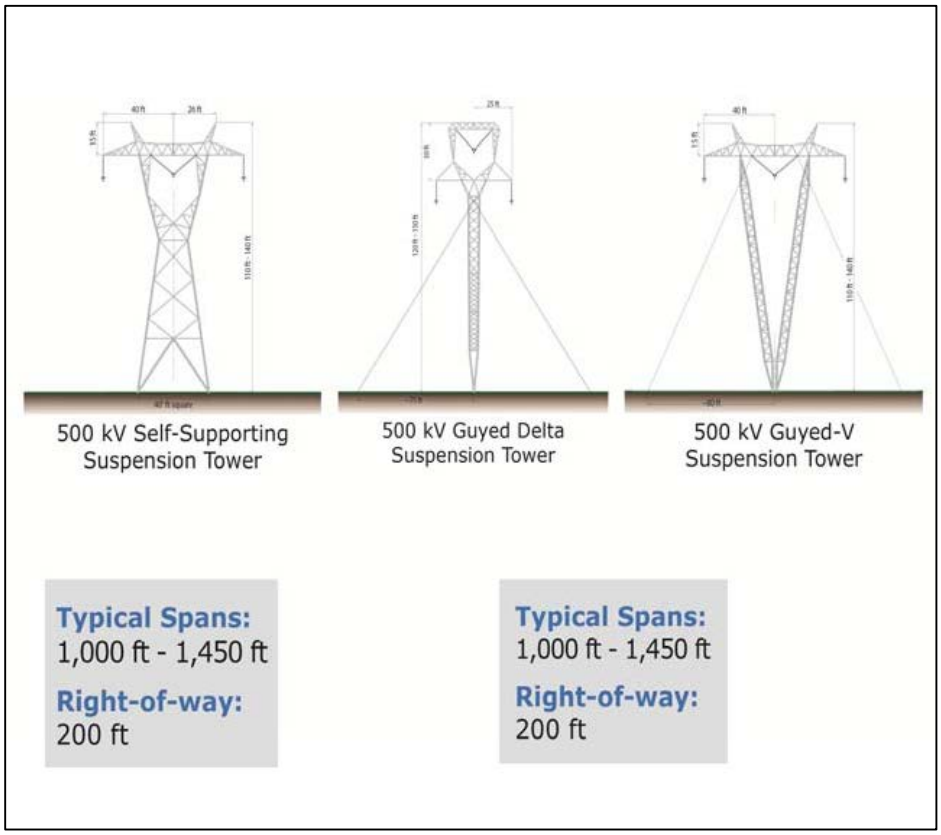


Figure 1 Structure Schematics

2.4.1.1 Vegetation Clearing

The Applicant would have to clear all woody vegetation and brush within the 200-foot-wide ROW to ensure that facilities can be safely and efficiently constructed, operated, and maintained. The Applicant has proposed to leave low-growing woody vegetation in wetlands within the outer one-third of the ROW. A reasonably level temporary access path is necessary so construction equipment can pass safely. At structure locations, a stable working surface free of tripping hazards is necessary for installing foundations and guy anchors and for assembling and erecting structures.

Vegetation would be cut at or slightly above the ground surface. Rootstock would be left in place to stabilize existing soils and to regenerate vegetation after construction. With the approval of the landowner or land manager, stumps of tall-growing species would be treated with an approved herbicide to discourage re-growth.

To minimize the potential for tire and chassis damage to construction equipment, and to maintain a safe, level, temporary access path during construction, incidental stumps would be removed.

Merchantable timber would be cut to standard log lengths and stacked along the ROW. To the extent practical, the Applicant would work with the landowner to determine a mutually agreeable means of disposing of the cleared material, such as chipping, burning, or stacking for landowner use or sale. Vegetation clearing debris (that is, unmerchantable trees, brush, and slash) may be cut and scattered, placed in windrow piles, chipped, or burned, depending on location.

In order to avoid potential direct impacts to the northern long-eared bat, the Applicant will avoid tree clearing during the bat's pup season of June and July. The Applicant intends to clear trees during the winter months, outside of the bat's maternal roosting period from April 1 through September 30, to the extent practicable; but tree clearing will likely be necessary during other times of the year. However, prior to clearing trees during the maternal roosting period (but outside of the pup season), the Applicant has agreed to conduct acoustical surveys (see Section 6.3 of this BA).

2.4.1.2 Construction Methodology

Construction materials would be hauled either directly to structure sites from the local highway or railroad network, or brought first to material staging areas and then to the structure sites. The transmission line components, including the structures, conductor, and hardware, are normally brought to the temporary staging areas on flatbed trucks. These materials are stored until needed and then loaded on flatbed trailers or special structure trailers for delivery to the structure site where they are unloaded for installation.

Where reinforced concrete foundations are required, large rubber-tired or track-mounted auger equipment is used to excavate a circular hole of the appropriate diameter and depth. In upland areas, excavated material would be spread evenly around the structure base to promote site drainage. Reinforcing steel and anchor bolts are set in position. Ready-mixed concrete is then placed in the excavation.

In wetland areas, a telescoping temporary steel caisson would be placed in the foundation hole to stabilize the soil walls. Water pumped from the excavation would be either 1) appropriately filtered prior to discharge at the site, 2) placed in tanker trucks or empty concrete trucks and hauled to a specially designated upland disposal area, or 3) brought back to the concrete batch plant for discharge. Concrete truck wash-water would be discharged only in specially designated upland disposal areas or at the concrete batch plant.

After the concrete is poured, the steel caisson is removed. In some situations, a permanent caisson may be required to stabilize the excavation. During drilling, a minimal amount of granular material (from an outside source) may be placed in the area between the caissons and the matting (if required at that location) to provide safe footing for construction personnel.

The Applicant and its contractors would remove construction waste and scrap on a regular schedule or at the end of each construction phase to minimize short-term visual impacts. Regular, frequent cleaning of construction equipment and vehicles on the ROW would occur. Restoration of cleared ROWs, storage areas, and access roads would minimize the extent of disturbed areas and limit the potential for dust generation.

2.4.1.3 Restoration/Re-vegetation

Following construction, the granular construction material would be leveled or removed to reinstate the original ground contours for re-vegetation of native species. Once the foundation concrete has been placed, excess excavated materials would be transported by truck to a suitable upland site for disposal. After allowing adequate curing time, the baseplate structures are bolted to the concrete foundations.

In some cases driven-piling foundations may be required, as well as temporary and permanent guy anchors, large rubber-tired or track-mounted pile-driving equipment would be used to install the foundation. Additional fixtures or a concrete pile cap may also be attached to the piling foundation as necessary for structure setting. Piling foundations generally result in little or no generation of spoils or dewatering requirements.

Once the structures have been completed and appropriate stringing equipment has been installed, wires can be strung. The wire-stringing process would begin in a set-up area prepared to accommodate the stringing equipment and materials, normally located near mid-span on the centerline of the ROW.

Using stringing blocks, pulley ropes and other equipment, and with careful monitoring by the construction crew, the wires are finally strung and clipped into place. If set-up areas in wetlands have unstable surface conditions, timber matting may need to be used. The Presidential permit and Route Permit applications provide a more detailed description of the wire-stringing process.

When the site is later restored, the granular material would be leveled or removed to reinstate the original ground contours for re-vegetation. Where rutting occurs, the Applicant would repair the surface before restoring ground vegetation. Soil compaction in cultivated areas would be treated and restored through tillage operations.

All areas of ground disturbance not permanently altered would be prepared for restoration and reseeded with an appropriate seed mix recommended by the appropriate agency's management or according to landowner requirements. The Applicant has indicated that they would continue to coordinate with MnDNR to minimize and avoid impacts on plant communities on state lands through adjustments to the anticipated ROW, permit conditions, and mitigation. Where forested areas are cleared, appropriate herbaceous native seed mixes from sources as close as possible to the impacted area would be used to

re-vegetate, as rapidly as possible, to prevent encroachment by non-native and noxious weed species. Where possible, reliance on natural re-vegetation would be encouraged (particularly in wetland areas).

2.4.2 Substation

The proposed Project would terminate at the proposed Iron Range 500 kV Substation, located on the same site as the Applicant's existing Blackberry 230/115 kV Substation, adjacent to and east of the existing substation (Map 1), and would be designed to accommodate the new 500 kV transmission line, 500/230 kV transformation, existing 230 kV transmission lines, and all associated 500 kV and 230 kV equipment. Existing 230 kV and 115 kV transmission lines currently located on the property would also need to be rerouted. The proposed Iron Range 500 kV Substation and access roads would permanently impact approximately 23 acres.

The new substation would be constructed in compliance with the applicable requirements of the National Electric Safety Code (NESC), Occupational Safety and Health Administration (OSHA), and state and local regulations. Designs would be completed by professional engineers who are licensed in Minnesota and have relevant experience. Contractors would be committed to safe working practices.

The final designs would consider local conditions and access considerations, and where warranted, would include safety provisions beyond the minimum requirements established in the various applicable safety codes. The designs would also strive to facilitate future maintenance.

2.4.3 500 kV Series Compensation Station

The proposed Project would also require a 500 kV series compensation station to be located within or adjacent to the final approved route (Map 1). The series compensation station would include the necessary 500 kV series capacitor banks and all associated 500 kV equipment. The 500 kV series compensation station would permanently impact approximately 6 acres.

The new series compensation station would be constructed in compliance with the applicable requirements of NESC, OSHA, and state and local regulations. Designs would be completed by professional engineers who are licensed in Minnesota and have relevant experience. Contractors would be committed to safe working practices.

The final designs would consider local conditions and access considerations, and where warranted, would include safety provisions beyond the minimum requirements established in the various applicable safety codes. The designs would also strive to facilitate future maintenance.

2.4.4 Regeneration Stations

The Applicant proposes to locate three regeneration stations within or adjacent to the final route approved by the MN PUC (Map 1). The sites would be 75 feet by 75 feet and located on uplands.

2.4.5 Permanent Access Roads

The Applicant proposes to establish a permanent "2-track" trail on uplands within the ROW as a result of construction traffic. This "2-track" trail would be unimproved and it is assumed that there would be no grading or filling for this permanent access.

2.4.6 Temporary Access Roads, Laydown Areas, and Fly-in Sites

The Applicant has indicated the need for constructing temporary access roads outside of the ROW; the anticipated access road width is 16 feet. The Applicant proposes to establish a main staging area for temporary storage of materials and equipment. Such an area would include sufficient space to lay down material and pre-assemble some structural components or hardware. Other staging areas located along the ROW would be limited to a structure site for lay down and framing prior to structure installation. In general, the laydown yards would be approximately 20 to 40 acres and would be located along suitable roadways approximately 40 to 50 miles apart and would be within five miles of the final route approved by the MN PUC. The Applicant has indicated that upland areas with prior disturbance would be preferred for siting staging areas; however, there may be some areas where this is not feasible and other areas would be used. Staging areas would be in place for at least one year and would be used to store equipment and materials and include the construction offices.

Similar to laydown yards, the Applicant proposes to establish fly-in yards that would be approximately 10 acres in size, located as near to the ROW as possible, and approximately 5 to 7 miles apart. Upland areas with prior disturbance would be preferred; however, there may be some areas where this is not feasible and other areas would be used. These sites would be in place for less than 1 year (likely 6 months) and would be used to assemble structures for sky crane construction. The Applicant would identify final fly-in locations during final design.

The Applicant proposes to establish temporary stringing sites within or adjacent to the final route approved by the MN PUC. The sites would be 200 feet by 600 feet with a two-mile spacing.

To the extent practicable, staging areas would be located and arranged in a manner to preserve trees and vegetation and restored to preconstruction conditions.

Temporary access roads outside of the ROW would be required. The Applicant would work with local property owners to identify suitable access locations. Temporary roads and other temporarily impacted areas would be restored as appropriate once construction is completed.

2.5 Maintenance and Operation

The following subsections describe how the Applicant proposes to maintain and operate the transmission line and facilities for the proposed Project.

2.5.1 Transmission Line

A transmission line must be inspected, maintained, and repaired over the entire life of the facility. The 500 kV transmission lines are generally inspected annually by foot, all-terrain vehicle, truck, or snowmobile, or

by air. Inspections are limited to the ROW and to those areas where obstruction or terrain may require off-ROW access.

Vegetation in the ROW that could interfere with operations must be removed. In most cases, the ROW would need to remain free of trees throughout construction and operation of the proposed Project; however, the Applicant has indicated that bushy shrubs and low-growing vegetation could be allowed to regenerate in portions of the ROW to reduce, though not eliminate, the visual impacts. Planting of visual screening would be considered on a case-by-case basis.

Vegetation maintenance for 500 kV transmission lines is typically on a 2- to 5-year cycle. Vegetation may be cleared using a combination of mechanical and hand clearing, and herbicides may be applied where allowed and approved by the landowner. Prior to maintaining vegetation in a particular area, the Applicant would make an effort to notify affected landowners.

2.5.2 Substation

Substation facilities must be regularly inspected, maintained, and repaired over the life of the facilities, and vegetation that might interfere with the safe and reliable operation of the facilities must be removed.

In order to minimize potential safety impacts, the substation facilities would have appropriate signage, would be fenced, and access would be limited to authorized personnel.

2.5.3 500 kV Series Compensation Station

The 500 kV series compensation station must be regularly inspected, maintained, and repaired over the life of it, and vegetation that might interfere with its safe and reliable operation would be removed.

In order to minimize potential safety impacts, the 500 kV series compensation station would have appropriate signage, would be fenced, and access would be limited to authorized personnel.

2.5.4 Regeneration Stations

The regeneration stations must be regularly inspected, maintained, and repaired over their lifespan, and vegetation that might interfere with their safe and reliable operation would be removed.

In order to minimize potential safety impacts, the regeneration stations would have appropriate signage, would be fenced, and access would be limited to authorized personnel.

2.5.5 Permanent Access Roads

Permanent access roads must be regularly inspected, maintained, and repaired over their lifespan, and vegetation that might interfere with their safe and reliable operation must be removed.

2.6 Construction and Schedule

The Applicant requires an in-service date of June 1, 2020. Currently, the Presidential permit and Route Permit approval process (including federal and state environmental review) would be completed by early 2016. Depending on the timing of other permits, construction is estimated to begin in 2017.

2.7 Impact Minimization and Conservation Measures

As part of the application development process, the Applicant detailed a number of industry-accepted best management practices (BMPs) that would be incorporated to avoid or minimize environmental impacts during construction and operation of the proposed Project. These BMPs are identified and summarized in the EIS, including but not limited to the following: vegetation management, including noxious weed and invasive species control, soil management, spill management, water resources management, and cultural resources management (DOE 2015).

Specific measures intended to avoid impacts on threatened or endangered species and their occupied habitats are summarized below.

2.7.1 Applicant–Proposed Avoidance and Minimization Measures

Section 2.13 of the EIS provides details of Applicant-proposed avoidance and minimization measures for the proposed Project (DOE 2015). Applicant-proposed measures that are applicable to federally-listed species are summarized here. The Applicant has indicated that they would retain an environmental inspector during project construction, responsible for understanding all of the conditions of the proposed Project's environmental permits and ensuring that contractors abide by these conditions.

The Applicant has indicated that construction crews would follow local, state, and federal regulations with regard to construction noise, dust, and timing. Construction crews would comply with local, state, and NESC standards regarding installation of facilities and standard construction practices. Established Applicant and industry safety procedures would be followed during and after construction of the proposed Project, including clear signage during all construction activities.

The Applicant has proposed to avoid or minimize impacts on federally-listed species and their occupied habitats across the proposed Project. In addition, measures developed through consultation with agencies including the USFWS and MnDNR would be included, if applicable.

The Applicant would develop an Avian Protection Plan, which would include an avian impact risk mitigation strategy. The Applicant would also incorporate industry best practices, which are consistent with Avian Powerline Interaction Committee's 2012 guidelines. The Applicant would work with the USFWS and MnDNR to identify potential locations for line marking, such as areas of high avian use, nest sites, feeding areas, and migratory corridors.

Surveys would be conducted prior to vegetation removal to avoid impacts on nesting birds and to avoid active nest sites of sensitive species. Appropriate construction windows would be incorporated into the

construction schedule to minimize impacts on species such as bald eagle and goshawk in areas where these species are found to be present.

If the ROW is not cleared or mowed in the fall or winter before the breeding season, the Applicant would have a qualified biologist conduct surveys for active nesting birds prior to construction. If active nesting locations are identified during the surveys, the Applicant proposes to avoid nest sites during the breeding season and to identify construction restraints that would avoid disturbance to nesting birds.

The Applicant would conduct surveys for sensitive plants during appropriate periods of the growing season to properly identify their presence and/or absence along the selected ROW. If sensitive plants or communities are identified during surveys, individual avoidance and minimization measures would be evaluated and submitted to the appropriate regulatory agencies prior to construction.

The Applicant would conduct surveys for native prairie areas and other sensitive plant communities such as calcareous fens along the selected ROW. If sensitive resources are encountered, construction plans that minimize the impacts, such as shifting structure locations or implementing construction techniques that avoid or minimize impacts on these resources, would be developed and submitted to the appropriate regulatory agencies prior to construction.

Avoidance measures may include shifting the location of structures or implementing construction techniques that avoid and/or minimize impacts on sensitive biological resources.

3.0 No Action Alternative

Under the No Action Alternative, environmental impacts associated with the proposed Project, including potential impacts on federally-listed species, would not occur.

4.0 Federally-Listed Species and Designated Critical Habitat

The USFWS technical assistance website was reviewed to determine if any federally-listed species or federally-designated critical habitats are known to be present in the counties located across the proposed Project area, including Roseau, Lake of the Woods, Koochiching, Beltrami, and Itasca counties (USFWS 2015a). The USFWS lists six species as occurring across the counties in the proposed Project area, including the federally-endangered Poweshiek skipperling (*Oarisma poweshiek*) butterfly in Roseau County and the federally threatened gray wolf (*Canis lupus*), Canada lynx (*Lynx canadensis*), and northern long-eared bat (*Myotis septentrionalis*) in all five counties; the federally threatened piping plover (*Charadrius melodus*) in Lake of the Woods County; and the federal candidate bird, Sprague's pipit (*Anthus spragueii*) in Roseau County (USFWS 2015a; Table 4).

The USFWS Information, Planning, and Conservation (IPaC) System was also queried to obtain a list of federally-listed species that could potentially be impacted by a transmission line project in Roseau, Lake of the Woods, Koochiching, Beltrami, and/or Itasca counties (USFWS 2015b). The IPaC query identified the gray wolf, Canada lynx, and the northern long-eared bat across all counties in the proposed Project area, piping plover in Lake of the Woods County, and the federally-threatened western prairie fringed orchid (*Platanthera praeclara*) in Roseau County.

Designated critical habitat associated with federally listed species consists of "the specific areas within the geographical area occupied by the species, at the time it is listed…on which are found within those physical or biological features (I) essential to the conservation of the species and (II) which may require special management considerations or protection" (50 CFR 1533[b][2]). Designated critical habitat for the gray wolf is present in the Action Area and Study Area (Map 5); however no other designated critical habitat for other federally-listed species is present in the Action Area or Study Area.

Table 4 Likelihood of Occurrence of Federally-Listed Species within Geographic Sections

Scientific Name	Common Name	ESA Status[1]	Critical Habitat		Possible Occurrence within Geographic Sections		
			Designated for Species?	Located within or adjacent to Proposed Action Area?	West Section (Roseau and Lake of the Woods Counties)	Central Section (Lake of the Woods, Koochiching, Beltrami, and Itasca Counties)	East Section (Koochiching and Itasca Counties)
Oarisma poweshiek	Poweshiek skipperling	E	No[2]	No	Yes	No	No
Canis lupus	Gray wolf	T	Yes	Yes	Yes[3]	Yes[3]	Yes[3]
Charadrius melodus	Piping plover	T	Yes	No	Yes[3]	Yes[3]	No
Lynx canadensis	Canada lynx	T	Yes	No	Yes[3]	Yes[3]	Yes[3]
Myotis septentrionalis	Northern long-eared bat	T	No	No	Yes[3]	Yes[3]	Yes[3]
Platanthera[3] *praeclara*	Western prairie fringed orchid	T	No	No	Yes[4]	No	No
Anthus spragueii	Sprague's pipit	Can.	No	No	Yes	No	No

(1)"E" refers to federally-listed as endangered, "T" refers to federally-listed as threatened, "Can" refers to federal candidate species.
(2) The USFWS proposed designated critical habitat for Poweshiek skipperling October 24, 2013 in portions of Minnesota, Iowa, Michigan, Wisconsin, and the Dakotas.
(3) The western prairie fringed orchid is not listed for counties in the proposed Project area but is listed in Kittson County, which is west of Roseau County. This species was identified by IPaC as a species that should be considered in the effects analysis for Roseau County.
(4) Species identified in IPaC query.

4.1 Poweshiek Skipperling

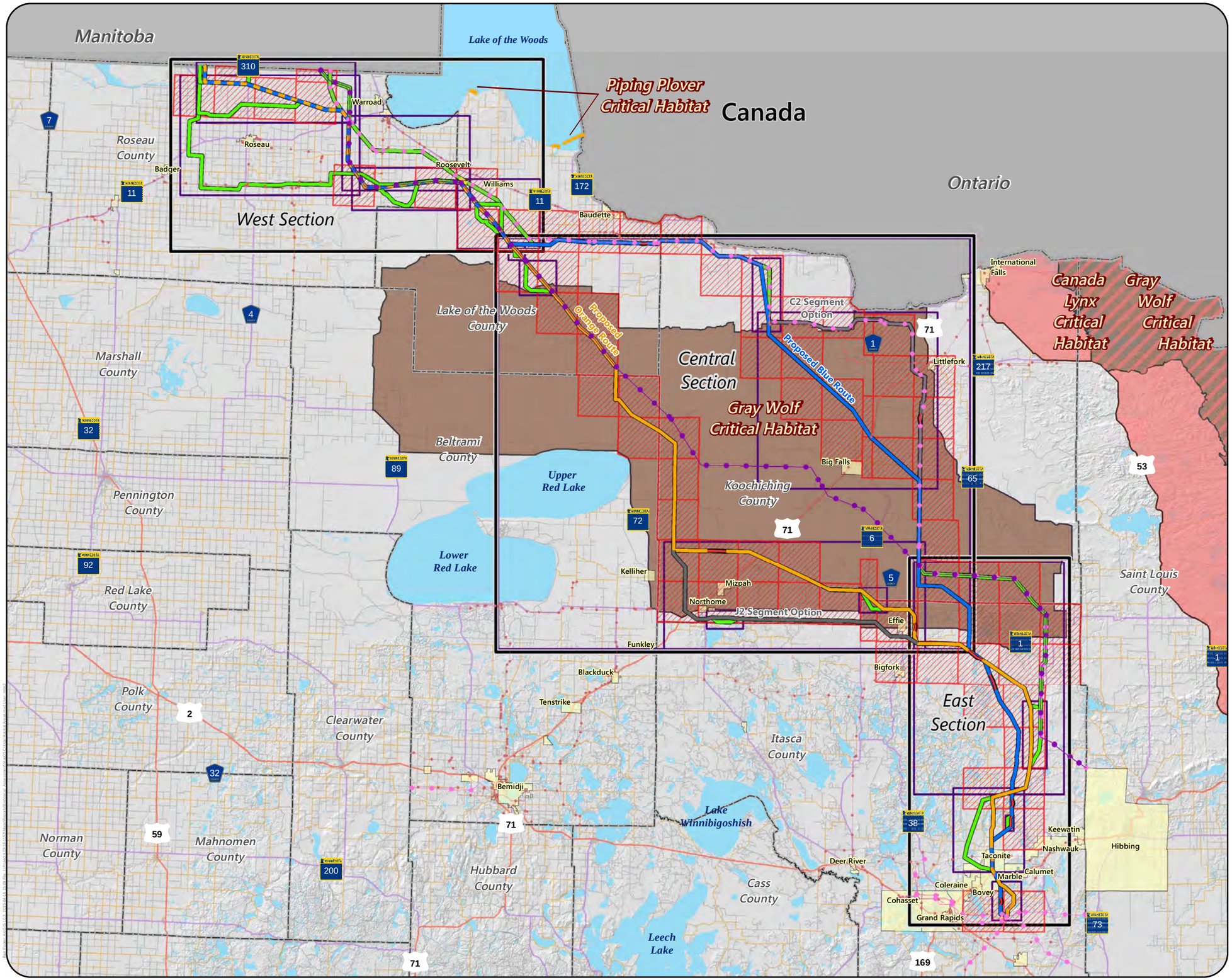
The USFWS issued a ruling on October 24, 2014 listing the Poweshiek skipperling as endangered (79 Federal Register 63671-63748). Current populations are believed to be at very low numbers and it is possible the species is no longer present in Minnesota, Iowa, and the Dakotas (USFWS 2014a).

In 2014, the USFWS proposed 61 units of critical habitat for the Poweshiek skipperling, 18 of which occur in Minnesota (78 Federal Register 63625-63745).

4.1.1 Behavior and Life History

The Poweshiek skipperling is a small, dark butterfly measuring about one inch. The wing margins have light orange coloring and the underside of the wings have distinct white veins (USFWS 2014a).

Adult butterflies feed on a variety of prairie flowers and lay their eggs on leaf blades. Larvae overwinter on the plants, usually near the base and resume activity in the spring until they pupate and emerge as adult butterflies. The species has one flight period and adults live for one to two weeks in mid-June to mid-July.



Proposed Routes
- Blue/Orange Route
- Blue Route
- Orange Route
- Segment Option

Alternatives
- Route Variation
- Route Variation Hop
- Alignment Modification

Existing Transmission Lines
- 69 or 115 kV
- 230 kV
- 500 kV

Streets and Highways
- US Highway
- State Trunk Highway
- County State Aid Highway
- Local Road
- Variation Area
- Project Section
- Municipal Boundary
- County Boundary
- International Boundary
- Wolf-Occupied Township

Critical Habitat Extents
- Canada Lynx
- Gray Wolf Critical Habitat
- Piping Plover Critical Habitat

Miles
14 7 0 14

Map 5

CRITICAL HABITAT AREAS
Great Northern Transmission Line
Biological Assessment

U.S. DEPARTMENT OF ENERGY
MINNESOTA DEPARTMENT OF COMMERCE

4.1.2 Distribution and Habitat

Historically, the Poweshiek skipperling's range covered several states including North Dakota, South Dakota, Minnesota, Wisconsin, Michigan, Iowa, Illinois, and Indiana (USFWS 2014a) as well as Manitoba. Despite the large historic range, as of 2014, this species is known only to occur in Wisconsin, Michigan, and Manitoba and may very well be extirpated from Minnesota, the Dakotas, and Iowa.

The Poweshiek skipperling occupies high-quality tallgrass prairie in upland and low, moist areas. Suitable habitat for the Poweshiek skipperling is present in the Study Area; however, this habitat is limited and is only present in the far western portion of the Study Area.

4.1.3 Threats

The two primary threats to the Poweshiek skipperling are habitat loss and habitat fragmentation. Additionally, of the remaining habitat, the majority of it is not managed in ways that can support this species.

4.1.4 Occurrence in the Proposed Project Area

According to the MnDNR Natural Heritage Information System (NHIS) database, the nearest documented record of a Poweshiek skipperling is in southwest Roseau County, approximately 20 miles southwest of the westernmost variation in the Roseau Lake WMA Variation Area in the West Section.

No designated critical habitat has been finalized for this species; however, the nearest proposed designated critical habitat for the Poweshiek skipperling is located in Mahnomen County, Minnesota, which is over 60 miles from the Study Area.

4.1.5 Determination of Effects

Since the Poweshiek skipperling has not been documented in the Study Area and proposed critical designated habitat is not present in the Study Area, DOE has concluded that the proposed Project would have no effect on this species.

4.2 Gray Wolf

The gray wolf was federally listed as an endangered species in 1974 and was reclassified as threatened in 1977 (42 Federal Register 29527-29532). In 2011, the wolf was delisted by the USFWS (76 Federal Register 57943-57944). However, in 2014, a federal court reversed the USFWS decision to delist the gray wolf, restoring federal threatened status and designated critical habitat in Minnesota.

In April 2003, gray wolf populations in the United States were separated into three DPSs to more effectively manage the species. The Minnesota population was a designated portion of the Eastern DPS.

Critical habitat was designated for the gray wolf in 1978. Designated critical habitat was identified in Isle Royale National Park, Michigan, and Minnesota wolf management zones 1, 2, and 3. In northeastern and northcentral Minnesota, wolf management zones 1, 2, and 3 comprise approximately 9,800 square miles.

Much of the proposed Project area, including the Central Section and the northern part of the East Section, is located in wolf management zone 3 (Map 5).

While no specific primary constituent elements have been formalized for the gray wolf, the USFWS has identified five main factors critical to the long-term survival of gray wolf (USFWS 1992), these include:

- Large tracts of wild land with low human densities and minimal accessibility by humans;
- Ecologically sound management;
- Availability of adequate wild prey;
- Adequate understanding of wolf ecology and management, and
- Maintenance of populations that are either free of, or resistant to, parasites and diseases new to wolves or are large enough to successfully contend with their adverse effects.

4.2.1 Behavior and Life History

Gray wolves are the largest wild members of the canid family (*Canidae*) with adults ranging from 40 to 175 pounds, depending on sex and subspecies (Mech 1974). Wolves are carnivorous predators that prefer a diet of medium and large mammals. The primary prey species in Minnesota include white-tailed deer (*Odocoileus virginianus*) and moose (*Alces alces*), with smaller mammals, such as beaver (*Castor canadensis*) and snowshoe hare (*Lepus americanus*) as important secondary prey sources; small mammals and birds are also occasionally consumed (MnDNR 2015a).

Gray wolves are social animals, typically living in packs of 2 to 30 wolves, with packs in Minnesota ranging in size from four to eight wolves (Fuller 1989). Packs are primarily family groups consisting of a breeding pair, their pups from the current year, offspring from the previous year, and occasionally an unrelated wolf.

Gray wolves breed between February and March in Minnesota and normally only the top-ranking (alpha) male and female in each pack breeds (MnDNR 2015a). Litters are born from early April to May and range from four to seven pups (MnDNR 2015a).

4.2.2 Distribution and Habitat

Gray wolves are habitat generalists that depend on distribution of their prey, rather than the type, age, or structure of vegetation present. Gray wolves occupy a diversity of habitats, including forests, prairies, and swamps, reflecting their adaptability as a species (USFWS 2012). Wolf territory size is highly variable; in Minnesota, territory sizes range between 25 and 150 square miles (MnDNR 2015a).

Surveys of the Minnesota wolf population in Minnesota have been carried out since 1979. These surveys estimated that in Minnesota there were 1,235 wolves in 1979; 1,500 to 1,750 in 1989; 2,440 in 1998; 3,020 in 2004; 2,920 in 2008; 2,200 in 2012; and 2,420 in 2014 (Berg and Kuehn 1982, Fuller et al. 1992, Erb 2008, Erb and Samson 2013, 2014). From 1998 to present, the Minnesota wolf population is well above the

MnDNR minimum population threshold of 1,600 individuals to ensure long-term survival (MnDNR 2001). At present there are very few suitable areas in Minnesota that remain unoccupied by gray wolves (MnDNR 2015a).

4.2.3 Threats

The primary long-term threat to gray wolves in Minnesota is habitat reduction and destruction (MnDNR 2015a).

4.2.4 Occurrence in the Proposed Project Area

Gray wolves are known to be present throughout the vicinity of the proposed Project area, as indicated in the gray wolf occupied township data on Map 5 (Erb 2008, Erb and Samson 2013, 2014).

Much of the proposed Project area, including the Central Section and the northern part of the East Section, is located in designated critical habitat for gray wolf, specifically wolf management zone 3 (Map 5).

4.2.5 Determination of Effects

See Section 6.1, Section 8.1, and Section 8.2 of this BA for information on determination of effects.

4.3 Piping Plover

On December 11, 1985, the USFWS issued a final ruling listing the Great Plains and Atlantic populations of piping plover as threatened and the Great Lakes population of piping plover as endangered (50 Federal Register 50726-50734). The piping plovers nesting in Lake of the Woods, north of the Study Area, are part of the Great Plains Population.

Piping plover nesting surveys, which were conducted in 2006, reported 2,959 adult individuals in the Great Plains population (Elliot-Smith et al. 2009); however, only four adults were observed in Minnesota during the 2006 surveys (MnDNR 2015b). Nearly all of the Great Plains population breeds in North Dakota, Montana, and Southern Canada. Piping plover nesting surveys conducted in 2007 reported 63 breeding pairs in the Great Lakes population, which includes pairs nesting along and near the shores of Lake Superior in St. Louis County (USFWS 2014b). The Atlantic Coast population of piping plover is located well outside of the region in which the proposed Project is located.

The USFWS issued a final ruling designating critical habitat for the Great Plains piping plover on September 11, 2002. The critical habitat includes Rocky Point Wildlife Management Area, Morris Point, and Pine and Curry Island Scientific and Natural Area (SNA) (Map 5; 67 Federal Register 57638-57717).

4.3.1 Behavior and Life History

The piping plover is a small, stocky shorebird averaging 6 to 7 inches in length and weighing 2 ounces (National Geographic Society 1983). Adult males are distinguished by a dark band between eyes and a distinct single breast band. The color of the species is described as dry sand with light underparts and yellow or orange legs (Peterson 2008).

Piping plovers begin their breeding season in mid to late-April when males arrive at the breeding grounds and establish territories. These territories are defended, and when females arrive at the breeding grounds several weeks later, males engage in elaborate courtship rituals including aerial displays, whistling songs, and drumming of the feet (Hull 1981). Plovers exhibit site fidelity, returning to the same nesting location in consecutive years (Wilcox 1959). Nests are simple scrape depressions in sand and are often lined with pebbles, shells, or other debris thought to improve the camouflage (Wilcox 1959). The majority of breeding adults migrate south by mid to late summer, with juveniles remaining as late as mid-August (Cuthbert and Weins 1982).

4.3.2 Distribution and Habitat

The Northern Great Plains population range includes southern Alberta, southern Saskatchewan, and southern Manitoba, south to eastern Montana, North Dakota, South Dakota, southeastern Colorado, Iowa, Nebraska, and east to Lake of the Woods in north-central Minnesota. Most of the United States' pairs are in the Dakotas, Nebraska, and Montana (67 Federal Register 57638-57717). In Minnesota, the Northern Great Plains population is limited to one population in Lake of the Woods (Elliot-Smith, Haig, and Powers 2009).

Piping plovers primarily occupy open, sandy, sparsely vegetated areas (Peterson 2008). The physical primary constituent elements of critical habitat in Lake of the Woods include "sparsely vegetated and windswept sandy to gravelly islands, beaches, and peninsulas, and their interface with the water body" (67 Federal Register 57638-57717). No suitable piping plover habitat is present in the Study Area.

4.3.3 Threats

The primary threats to the piping plover are nesting habitat loss and degradation and human nest disturbance and animal predation (USFWS 1991).

4.3.4 Occurrence in the Proposed Project Area

According to the NHIS database, there is a breeding population of piping plover in Lake of the Woods, which is approximately 11 miles north of the northernmost variation in the Cedar Bend WMA Variation Area in the West Section.

Designated critical habitat for piping plover is present in Lake of the Woods, in three locations, including Rocky Point Wildlife Management Area and two locations in the Pine and Curry Island Scientific and Natural Area. All three areas of designated critical habitat for piping plover are located approximately 11 miles north/northeast of the Study Area.

4.3.5 Determination of Effects

Since the piping plover has not been documented in the Study Area and critical designated habitat is not present in the Study Area, DOE has concluded that the proposed Project would have no effect on this species.

4.4 Canada Lynx

The Canada lynx was listed as a federally threatened species in several states in the Northeast, Great Lakes Region (including Minnesota), and Southern Rockies in 2000 (65 Federal Register 16052-16086).

In 2006, the USFWS designated 317 square miles as critical habitat in Voyageurs National Park (71 Federal Register 66008-66061). In 2009, the USFWS re-designated lynx critical habitat to include portions of Cook, Koochiching, Lake, and St. Louis counties (74 Federal Register 8616-8702). A total of 8,065 square miles were designated as critical habitat in 2009 (74 Federal Register 8616-8702). Critical habitat designated for Canada lynx is not present in the proposed Project area; the nearest designated critical lynx habitat to the proposed Project area is identified on Map 5.

4.4.1 Behavior and Life History

The Canada lynx is a solitary forest-dwelling feline, 30 to 35 inches long and 14 to 31 pounds, similar in size and appearance to bobcats (*Lynx rufus*) (USFWS 2013). Snowshoe hare (*Lepus americanus*) represents the primary prey for Canada lynx. Canada lynx have long hind legs and large paws, which makes them highly adapted to hunting in deep snow typical of its range (USFWS 2013).

Canada lynx typically mate in March and April, and kittens are born from late April to mid-June. Litter sizes, ranging from one to six, and kitten survival correlate with snowshoe hare abundance. Litters of four or five and high kitten survival are common when hare numbers are high; when they are low, little or no reproduction may occur and few or no kittens survive to be recruited into the population.

4.4.2 Distribution and Habitat

The historical and present range of the Canada lynx, north of the contiguous U.S., includes Alaska and the portion of Canada extending from the Yukon and Northwest Territories south to the U.S. border and east to New Brunswick and Nova Scotia. In the contiguous U.S., Canada lynx historically occurred in Washington, Oregon, Montana, Wyoming, Idaho, Utah, and Colorado, Minnesota, Wisconsin, Michigan, New York, Vermont, New Hampshire, and Maine (USFWS 2013). The U.S. Forest Service (USFS) divides Canada lynx populations in the 48 contiguous states into the western Great Lakes population, eastern U.S. population, and the western U.S. population. Historically, Minnesota had the highest numbers of Canada lynx in the western Great Lakes population. In Minnesota, the majority of Canada lynx reports are from the northeastern portion of the state (MnDNR 2006). However, given the low densities of Canada lynx in Minnesota, it may be impossible to obtain an accurate population estimate (Moen 2009).

Based on a limited number of studies in northeastern Minnesota, the average home range for Canada lynx varies between 11 and 201 square miles for males, and 2 and 37 square miles for females (Burdett 2007). Male home ranges expand during the breeding season, perhaps due to males searching for females, while female home ranges contract (Moen et al. 2008).

Canada lynx inhabit boreal and mixed coniferous and deciduous forests, where snowshoe hare, their preferred prey, are present (USFWS 2013). Within these general forest types, Canada lynx are most likely to persist in areas that receive deep snow, for which the lynx is highly adapted. In the Great Lakes states,

Canada lynx records predominantly occur in boreal, coniferous, and mixed coniferous/deciduous vegetation types dominated by pine, balsam fir, black and white spruce, northern white cedar, tamarack, aspen, paper birch, conifer bogs and shrub swamps (USFWS 2000). Canada lynx denning habitat appears to be associated more with the availability of structural components of forests, such as blowdown, deadfalls and root wads, rather than forest cover type (USFWS 2000).

4.4.3 Threats

The Canada Lynx Conservation Assessment and Strategy (USFWS 2000) identifies the primary threats to Canada lynx productivity, mortality, and movement as follows:

Factors affecting productivity:

- Timber management practices, such as management for sawtimber production;
- Loss of habitat due to conversion to agriculture;
- Decline in fire disturbance, which has altered the spatial distribution of early successional habitats and the composition and structure of the mature forests.

Factors affecting mortality:

- Trapping;
- Increase in gray wolf population;
- Incidental or illegal shooting;
- Mortality due to vehicle collisions.

Factors affecting movement:

- Conversion to agriculture or forest types less suitable for lynx.

4.4.4 Occurrence in the Proposed Project Area

Although the majority of Canada lynx sighting in Minnesota have been found in St. Louis, Cook, and Lake counties (76 percent), Canada lynx sightings have also been documented in north-central Minnesota, including Roseau, Lake of the Woods, Koochiching, Itasca, and Beltrami counties, where the proposed Project is located (MnDNR 2006).

There is no designated critical habitat for Canada lynx in the proposed Project area. The nearest designated critical habitat for Canada lynx is approximately 11 miles east of the Study Area (Map 5).

4.4.5 Determination of Effects

See Section 6.2 and Section 8.1 of this BA for information on determination of effects.

4.5 Northern Long-Eared Bat

The northern long-eared bat was proposed for listing as a federally endangered species in 2013 (78 Federal Register 61046-61080). On April 2, 2015, the USFWS listed the northern long-eared bat as federally threatened under the ESA. Along with the listing, the USFWS announced an interim Section 4(d) rule, which exempts certain activities with no federal nexus from the ESA take prohibitions, provided certain conditions protective of northern long-eared bat hibernacula and roost trees are met (80 Federal Register 17974-18033).

4.5.1 Behavior and Life History

The northern long-eared bat is a medium-sized bat with a body length of 3 to 3.7 inches and a wingspan of 9 to 10 inches. The northern long-eared bat is distinguished from other bat species by its long ears (USFWS 2015c). Northern long-eared bats have delayed fertilization, with mating occurring prior to hibernation in the late summer or early fall and females storing sperm during hibernation until the following spring. Female bats then migrate to summer maternity sites and give birth to a single pup between late May and late July (USFWS 2015c). Young northern long-eared bats start flying 18 to 21 days after birth (USFWS 2015c).

Similar to other bat species, northern long-eared bats feed at dusk, primarily by flying through the understory of forested areas feeding on moths, flies, leafhoppers, caddisflies, and beetles.

4.5.2 Distribution and Habitat

The northern long-eared bat's range includes much of the eastern and north central United States, and all Canadian provinces from the Atlantic Ocean west to the southern Yukon Territory and eastern British Columbia.

Northern long-eared bats hibernate in caves and mines (hibernacula) during winter months (USFWS 2015c). In summer, northern long-eared bats roost singly (males and non-reproductive females) or in small groups (reproductive females) in live and dead trees with exfoliating bark, crevices, or hollows (USFWS 2015c). Northern long-eared bats appear to be flexible in selecting a roost, having been found in a variety of tree species with differing heights and diameters.

Linear corridors (i.e., edge habitat and forested riparian corridors) are important for northern long-eared bats as they use corridors to travel and forage (Wisconsin Department of Natural Resources 2013). Bats will migrate in the spring from hibernacula to summer roosts and return again in the fall, or fly from their roosts to feeding grounds following the linear corridors to maintain protection from wind and predation. In addition to the protection that linear corridors provide, this behavior may also allow bats more feeding opportunities because food is generally more abundant around these habitats.

The USFWS has not identified designated critical habitat for the northern long-eared bat at this time.

4.5.3 Threats

The primary threat to the northern long-eared bat is white-nose syndrome, caused by the fungus *Pseudogymnoascus destructans*, which infects skin of the muzzle, ears, and wings of bats during hibernation (USFWS 2015c; U.S. Geological Survey (USGS) 2015). Symptoms of white-nose syndrome were first documented in 2006 in New York and since then the disease has spread from the Northeast to the Midwest and Southeast. Based on hibernacula counts, numbers of northern long-eared bats have declined by up to 99 percent in the Northeast (USFWS 2015c).

Additional potential threats on northern long-eared bat populations include impacts to hibernacula, loss or degradation of summer habitat, and development and operation of wind farms (USFWS 2015c).

4.5.4 Occurrence in the Proposed Project Area

According to the NHIS database, the nearest documented record of a northern long-eared bat is in St. Louis County in the Soudan Underground Mine State Park, which is approximately 45 miles east of the Study Area. The Soudan Underground Mine State Park represents the largest hibernating colony of northern long-eared bats in Minnesota and contains at least 2,000 individuals (Nordquist et al. 2006). The April 2, 2015 USFWS announcement of the listing decision and interim 4(d) rule states that there are eleven documented hibernacula in Minnesota. One is the Sudan Mine, and the other is Mystery Cave in Fillmore County (80 Federal Register 17974-18033). The USFWS and the MnDNR have not published the locations of the other nine hibernacula in Minnesota.

The USFWS has deferred designation of critical habitat for the northern long-eared bat at this time. The northern long-eared bat is a habitat generalist, and identification of Primary Constituent Elements (PCEs) required for designation of critical habitat will require further research and effort by the USFWS.

Several recent studies have been conducted in Minnesota to further determine the abundance and distribution of the species in the state. These studies were summarized in the April 2, 2015 USFWS Federal Register announcement of the northern long-eared bat listing as follows:

In 2014, passive acoustic surveys conducted at a proposed new mining area in central St. Louis County detected the presence of northern long-eared bats at each of thirteen sites sampled, accounting for approximately 14 percent of all recorded bat calls. In addition, mist-net surveys conducted in 2014 at seven sites on Camp Ripley Training Center in Morrison County resulted in the capture of 24 northern long-eared bats, which was 55 percent of the total captures. In an additional field study, acoustic and mist-net data were collected in 2014 by a pipeline project proponent along a 300-mile corridor through the northern third of the state. Positive detections were recorded for Hubbard, Cass, Crow Wing, Aitkin and Carlton counties, and northern long-eared bats were the most common mist-netted species. Finally, mist-net surveys conducted in 2013 on the Kawishiwi District of the Superior National Forest resulted in the capture of 13 northern long-eared bats, or 38 percent of the total captures, over nine nights at eight sites (80 Federal Register 17974-18033).

4.5.5 Determination of Effects

See Section 6.3 and Section 8.1 of this BA for information on determination of effects.

4.6 Western Prairie Fringed Orchid

The USFWS issued a final ruling on September 28, 1989 listing the western prairie fringed orchid (*Platanthera praeclara*) as threatened (54 Federal Register 39858).

No critical habitat has been designated for the western prairie fringed orchid.

4.6.1 Behavior and Life History

The western prairie fringed orchid emerges between early May and mid-June in the northwestern part of Minnesota. Western prairie fringed orchid senesces in late September or earlier if soil moisture is low. This species flowers between early to mid-July. Flower stalks are up to 47 inches tall and each stalk has up to 40 white flowers that are approximately one inch long (USFWS 2004). This orchid produces a bud in late summer on its fleshy rhizome, which will remain dormant until the following spring when it will develop into the aerial stem. If the bud is damaged or fails to develop, no stem will be produced that spring. Rhizomes may survive and produce another bud in late summer, depending on nutrient reserves.

Western prairie fringe orchid pollinators in the northern part of the species' range include the bedstraw hawk moth (*Hyles gallii*), the wild cherry sphinx (*Sphinx drupiferarum*) the Achemon sphinx (*Eumorpha achemon*), and the non-native spurge hawk moth (*Hyles euphorbiae*). Not all flowers are pollinated every year, with 8 percent and 30 percent of flowers pollinated in Minnesota.

4.6.2 Distribution and Habitat

The western prairie fringed orchid occurs in the following ten counties in western and southern Minnesota: Clay, Dodge, Freeborn, Houston, Kandiyohi, Kittson, Mower, Norman, Pennington, Polk, and Rock (MnDNR 2015c). However, this species has not been documented in Houston, Freeborn, or Kandiyohi counties for several years and has possibly been extirpated from those areas (MnDNR 2015c). In Minnesota, the current distribution of western prairie fringed orchid closely corresponds with the distribution of specific habitat types based on geological and hydrological formations known as land type associations (LTA), namely, the Barnesville Beach Complex LTA in Clay, Norman, and Polk Counties; the Beach Ridges LTA in Pennington, Polk, and Red Lake Counties; the Gentilly Lake Plain LTA in Polk and Red Lake Counties; the Bronson Lake Plain LTA in Kittson County; the Trosky Till Plain LTA in Lincoln, Nobles, Pipestone, and Rock Counties; and the Blue Mounds LTA in Pipestone and Rock Counties (USFWS 2007).

The western prairie fringed orchid inhabits mesic to wet unplowed tallgrass prairies and meadows but have been found in old fields and roadside ditches (MnDNR 2015c, USFWS 2004).

4.6.3 Threats

The primary threat to this species is habitat loss, especially through conversion to cropland. Habitat degradation in the form of intensive haying, fire suppression, overgrazing, filling of wetlands, and associated increased competition from invasive plants also pose a significant threat to this species. Other

threats include human plant collection and environmental pollutants that impact the plant and its pollinating insects (USFWS 2004).

4.6.4 Occurrence in the Proposed Project Area

According to the MnDNR NHIS database, the nearest documented record of a western prairie fringed orchid is in Kittson County, approximately 27 miles west of the southwestern most variation in the Roseau Lake WMA Variation Area in the West Section.

4.6.5 Determination of Effects

Since the western prairie fringed orchid has not been documented in the Study Area and proposed critical designated habitat is not present in the Study Area, DOE has concluded that the proposed Project would have no effect on this species.

4.7 Sprague's Pipit

The USFWS announced a 12-month finding on a petition to list the Sprague's pipit as threatened or endangered on September 15, 2010. Although the USFWS determined listing was warranted, the agency elected to add the species to the list of candidate species until listing actions are taken on other, higher priority species (75 Federal Register 56028-56050). As a federal candidate species, Sprague's pipit is afforded no legal protection under the ESA.

As a candidate species, there is currently no critical habitat designated for this species.

4.7.1 Behavior and Life History

The Sprague's pipit is a pale, slender, secretive bird with a heavily-streaked back, white outer tail feathers, a thin bill, pinkish legs, and a buffy face and underparts (Peterson 2008). Sprague's pipit begins migrating north to breeding habitat in April, initiating breeding season in late April or early May. Male Sprague's pipits engage in towering, conspicuous display flights during the breeding season, often remaining in the air for hours at a time (Robbins 1998). Nests consist of a circle or cup of interwoven grasses in a slight depression (Baicich and Harrison 2005). Eggs have been found as early as June, and as late as August and September. It is widely believed that this species commonly double-broods in parts of its range. In September, Sprague's pipits gather in large flocks with horned larks and longspurs and begin southward migration (Bent 1950).

4.7.2 Distribution and Habitat

The breeding range of Sprague's pipit includes nearly all of North Dakota, northeastern Montana, northern South Dakota, and northwestern Minnesota. Breeding populations in Canada exist extensively in southeastern Alberta, southern Saskatchewan, and southwest Manitoba. An extrapolation of Breeding Bird Survey data indicates a range-wide estimated Sprague's pipit population of 870,000 (Rich, et al. 2004). Both the Breeding Bird Survey and the Christmas Bird Count indicate a long-term, sustained population decline.

Sprague's pipits prefer large patches of native grassland of intermediate height and sparse to intermediate vegetation density (Sutter 1996). Most research indicates Sprague's pipit is an area dependent species that requires tracts of suitable grasslands at least 145 hectares in size for nesting (Davis 2004).

4.7.3 Threats

Primary threats to the Sprague's pipit include habitat conversion and fragmentation (75 Federal Register 56025-56050).

4.7.4 Occurrence in the Proposed Project Area

According to the MnDNR NHIS database, the Sprague's pipit has been documented in the Study Area, in Roseau County. This record occurs within one mile of the proposed routes and/or variations in the Border Crossing and Roseau Lake WMA variation areas in the West Section.

As a candidate species, there is currently no critical habitat designated for this species.

4.7.5 Determination of Effects

See Section 6.4 and Section 8.1 of this BA for information on determination of effects.

5.0 Environmental Baseline Conditions

As discussed above in Section 2.1, the proposed Project was divided into three geographical sections for the EIS, including the West Section, Central Section, and East Section (Map 1). The boundaries of the three geographic sections were largely based on general ecological characteristics and population densities. In addition, the points at which the Proposed Route and variations were closely aligned to create common starting and ending points for comparison purposes was used to further define the geographic sections and the variation areas within those sections.

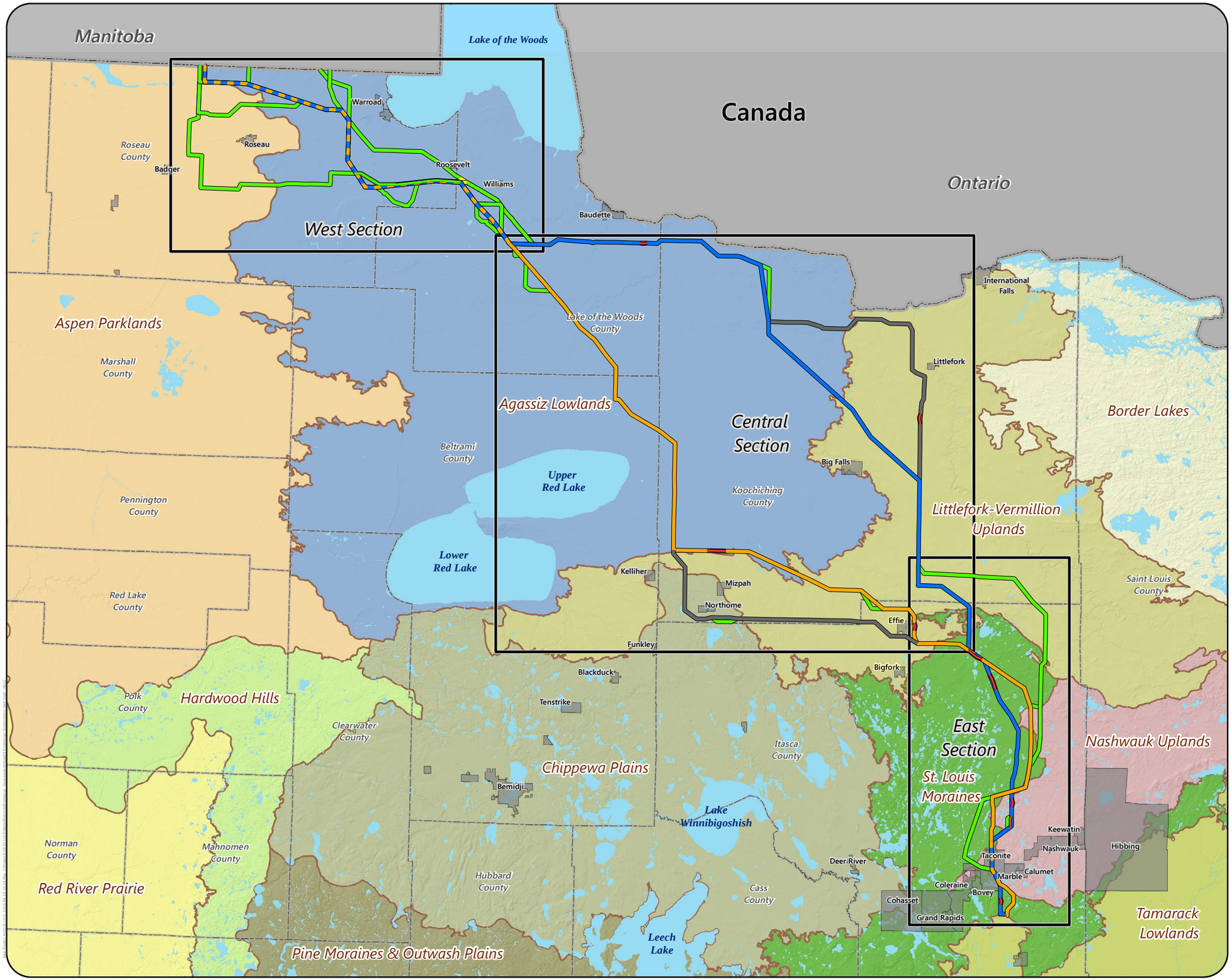
5.1 West Section

The West Section is located in Roseau and Lake of the Woods counties and consists of larger cities, rural residences, and privately-owned agricultural areas. In general, the West Section consists of agricultural land in the far western portion and transitions to forested peatlands/wetlands in the remainder of the section. Based on the USGS National Landscape Conservation System Gap Analysis Program (GAP), the dominant land cover types in the West Section include herbaceous agricultural vegetation, upland forests, and lowland swamps (Map 2). Upland forests are primarily dominated by aspen and birch, with lowland forests dominated by black spruce, tamarack, and/or northern white cedar.

According to the MnDNR and USFS ecological classification system, the West Section is primarily located in the Agassiz Lowlands subsection, which is located in the Northern Minnesota and Ontario Peatlands section of the Laurentian Mixed Forest Province (Map 6; MnDNR 2015d). This subsection is comprised of vast peatlands dominated by black spruce or tamarack and upland sand ridges dominated by aspen and birch or jack pine. The subsection is generally very flat and poorly drained. Past attempts at ditching and farming the peatlands have been largely unsuccessful and most of the subsection is uninhabited (MnDNR 2015d).

The western portion of the West Section is located in the Aspen Parklands subsection, which is located in the Lake Agassiz, Aspen Parklands section of the Tallgrass Aspen Parklands Province (Map 6; MnDNR 2015d). This subsection is considered a transitional landscape between prairies to the west and forests to the east and contains a mosaic of vegetation types including prairie, brushland, woodland, and forest. Peatlands are a common component in the subsection where the water table is near the ground surface (MnDNR 2015d).

Several state forests, including the Lost River State Forest, Beltrami Island State Forest, and Lake of the Woods State Forest, are located within or adjacent to variation areas in the West Section (Map 2). In addition, several sensitive ecological resources, such as SNAs, MnDNR-designated High Conservation Value Forest, Wildlife Management Areas (WMAs), Minnesota Biological Survey (MBS) Sites of Biodiversity Significance, and rare native plant communities are located within or adjacent to variation areas in the West Section.



Proposed Routes

- Blue/Orange Route
- Blue Route
- Orange Route
- Segment Option

Alternatives

- Route Variation
- Route Variation Hop
- Alignment Modification
- Project Section
- Municipal Boundary
- County Boundary
- International Boundary

Ecological Subsections

- Agassiz Lowlands
- Aspen Parklands
- Border Lakes
- Chippewa Plains
- Hardwood Hills
- Littlefork-Vermillion Uplands
- Nashwauk Uplands
- Pine Moraines & Outwash Plains
- Red River Prairie
- St. Louis Moraines
- Tamarack Lowlands

Miles

14 7 0 14

Map 6

ECOLOGICAL SUBSECTIONS

Great Northern Transmission Line
Biological Assessment

U.S. DEPARTMENT OF ENERGY

MINNESOTA DEPARTMENT OF COMMERCE

5.2 Central Section

The Central Section is located in southern Lake of the Woods County, northern Beltrami County, and Koochiching County and is characterized by low population densities, with large tracts of federal, state, and county owned lands present throughout the section. The economies of the Central Section include forestry and recreation, with little agriculture or manufacturing. In general, the Central Section is largely comprised of vast, flat, poorly drained peatlands and upland forested ridges. Based on USGS GAP data, the dominant land cover types in the Central Section include upland forests and lowland swamps (Map 3). Upland forests are primarily dominated by aspen and birch or white spruce, balsam fir, and hardwoods, with lowland forests dominated by black spruce, tamarack, and/or northern white cedar.

According to the MnDNR and USFS ecological classification system, the Central Section is primarily located in the Agassiz Lowlands and Littlefork-Vermillion Uplands subsections, which are located in the Northern Minnesota and Ontario Peatlands section of the Laurentian Mixed Forest Province (Map 6). A small part of the southern portion of this section is located in the Chippewa Plains subsection, which is located in the Northern Minnesota Drift and Lake Plains section of the Laurentian Mixed Forest Province (Map 6).

As indicated above for the West Section, the Agassiz Lowlands subsection is comprised of vast peatlands dominated by black spruce or tamarack and upland sand ridges dominated by aspen and birch or jack pine. The subsection is generally very flat and poorly drained.

The Littlefork-Vermillion Uplands subsection is a transition zone between the vast peatlands to the west and the shallow bedrock controlled, clayey soils to the east. Vegetation types include forests dominated by aspen-birch trending toward white pine, white spruce, and balsam fir. Forests in the eastern portion of the subsection are dominated by white pine, red pine, and jack pine. Poor and rich fens, black spruce bogs, and cedar-black ash swamps are typical in lowlands (MnDNR 2015d).

The Chippewa Plains subsection is comprised of level to gently-rolling till plain and lake plain settings, which form a mosaic of vegetation communities. Outwash plain settings tend toward sandy soils and support dry forest communities dominated by upland conifers. Vegetation communities in this subsection include upland conifer forest, shrub and woodland uplands, and non-forested wetlands (MnDNR 2015d).

Several state forests are located within or adjacent to variation areas in the Central Section, including the Beltrami Island State Forest, Lake of the Woods State Forest, Pine Island State Forest, Red Lake State Forest, Big Fork State Forest, Smokey Bear State Forest, George Washington State Forest, and Koochiching State Forest (Map 3). The Chippewa National Forest is located in the southern part of the Central Section (Map 3). In addition, several sensitive ecological resources, such as WMAs, SNAs, Ecologically Important Lowland Conifer Forests, and MBS Sites of Biodiversity Significance are located within or adjacent to variation areas in the Central Section.

5.3 East Section

The East Section is located in Itasca and Koochiching counties and has the highest population densities across the proposed Project. Large population centers such as Grand Rapids and the Iron Range cities

contain much of the population in this section. The economies of the communities in the East Section are centered on mining, tourism, and manufacturing, with relatively little agriculture. In general, the East Section transitions to steeper sloped forested landscapes with bogs, swamps, and lakes common. This area intersects the Mesabi Range, which is a narrow bedrock ridge trending from southwest to northeast and rising 200 to 400 feet above the surrounding land. Based on USGS GAP data, the dominant land cover types in the East Section include upland forests and lowland swamps (Map 4). Upland forests are primarily dominated by aspen and birch or white spruce, balsam fir, and hardwoods, with lowland forests dominated by black spruce, tamarack, and/or northern white cedar.

According to the MnDNR and USFS ecological classification system, the East Section is primarily located in three subsections of the Laurentian Mixed Forest Province (MnDNR 2015d). The Littlefork-Vermillion Uplands subsection, which is in the Northern Minnesota and Ontario Peatlands section, is located across the northern portion of the East Section (Map 6). The St. Louis Moraines subsection, which is in the Northern Minnesota Drift and Lake Plains section, covers the majority of the East Section (Map 6). The Nashwauk Uplands subsection, which is in Northern Superior Uplands section, covers the eastern portion of the East Section (Map 6).

As discussed above for the Central Section, the Littlefork-Vermillion Uplands subsection is a transition zone between the vast peatlands to the west and the shallow bedrock controlled, clayey soils to the east. Vegetation types include forests dominated by aspen-birch trending toward white pine, white spruce, and balsam fir. Forests in the eastern portion of the subsection are dominated by white pine, red pine, and jack pine. Poor and rich fens, black spruce bogs, and cedar-black ash swamps are typical in lowlands (MnDNR 2015d).

The St. Louis Moraines subsection is dominated by steep slopes on end moraine settings. White and red pine forests historically dominated the northern portions of the subsection, whereas northern hardwood and aspen forest dominated moraines to the south. Mixed deciduous and coniferous forests were common on moraines. Quaking aspen is currently the most dominant tree species in the subsection (MnDNR 2015d).

The Nashwauk Uplands subsection is dominated by Giant's Ridge, a narrow 200- to 400-foot-high bedrock feature extending northeast to southwest through the subsection. Glacial outwash plains, rolling till plains, and moraines of the Rainy Lobe glacier are the predominant landforms. Quaking aspen is currently the most dominant tree species in the subsection (MnDNR 2015d).

Several state forests are present in the East Section, including the Koochiching State Forest in the northern portion of the East Section, the George Washington State Forest in the central portion of the East Section, and a small part of the Bowstring State Forest in the western portion of the East Section (Map 4). The Chippewa National Forest is also located in the western part of the East Section; however none of the proposed routes or variations would come within a mile of it (Map 4). In addition, sensitive ecological resources, such as WMAs, Important Bird Areas, and MBS Sites of Biodiversity Significance are located within or adjacent to variation areas in the East Section.

6.0 Potential Effects on Federally-Listed Species

As discussed in Section 1 of this BA, the DOE has the responsibility under the ESA to determine whether or not the proposed Project would adversely affect federally-listed endangered or threatened species and/or their designated critical habitat.

Potential impacts on federally-listed species and designated critical habitat that could occur during construction and operation of the proposed Project are discussed in the subsections below. The Applicant has proposed measures to reduce potentially adverse impacts during construction and operations; these are described in Section 2.7.1 of this BA. DOE's determinations of effects are discussed throughout Section 6 of this BA and are summarized in Section 8. Section 7 of this BA presents a cumulative effects analysis of the proposed Project combined with other reasonably foreseeable actions on federally-listed species.

General Construction Impacts

During construction of the proposed Project, activities that generate noise and dust in the Action Area may cause disturbance to federally-listed species. Federally-listed species within or adjacent to the Action Area may be temporarily displaced and forced to utilize other habitats during construction. The proposed Project would require expansion of existing cleared corridors or the creation of new corridors in areas that are currently forest and shrubland. Clearing of woody vegetation could have adverse impacts on federally-listed species through loss, conversion, or fragmentation of habitat.

Conversion of vegetation structure alters species use by changing plant community composition and structure. When forested plant communities are converted to open communities, there are corresponding changes in wildlife communities. Federally-listed species that rely on well-developed forest canopies for nesting, foraging, or shelter may be permanently displaced from the portion of the landscape where this alteration occurs.

Habitat fragmentation reduces the size of contiguous blocks of vegetation, such as forest; this reduces the total area of contiguous habitat available to federally-listed species. Opportunistic and adaptable animals often succeed in highly fragmented habitats. Non-native invasive or pioneering plant species may encroach where disturbance provides a competitive advantage and an avenue of introduction, such as where habitat fragments occur. The alteration of plant community composition and structure can adversely affect those species that rely on the presence of certain plant species or vegetative cover. Fragmentation effects would be greatest where large contiguous blocks are broken up into smaller patches that reduce interior forest habitat necessary for some species. The effects of fragmentation would generally be greatest where new corridor is created, rather than where the transmission line parallels an existing corridor.

Operations and Maintenance Impacts

During operation and maintenance of the proposed Project, cleared areas would be permanently maintained to support low-stature vegetation in order to insure safe operation of the transmission line.

Routine clearing of vegetation in the Action Area may cause temporary displacement of federally-listed species foraging, breeding, or nesting in the Action Area or its vicinity.

Summary of Effects

Based on the analysis and the discussion of cumulative effects presented in Section 6 of this BA, DOE has concluded that any effects on the gray wolf, Canada lynx, and Sprague's pipit would be insignificant or discountable, and that the proposed Project may affect but is not likely to adversely affect, these species. DOE has concluded that any effects on northern long-eared bat would be negative, and that the proposed Project may adversely affect this species. DOE has concluded that any effects on gray wolf designated critical habitat would be negative, and that the proposed Project may affect and likely adversely affect gray wolf designated critical habitat. Table 5 provides a summary of potential impacts on federally-listed species potentially resulting from the proposed Project.

Table 5 Determination of Effect for Federally- Listed Species and Designated Critical Habitat Potentially Affected by the Proposed Project

Scientific Name	Common Name	ESA Status(1)	Determination of Effect
Canis lupus	Gray wolf	T	May affect, but not likely to adversely affect
Lynx canadensis	Canada lynx	T	May affect, but not likely to adversely affect
Myotis septentrionalis	Northern long-eared bat	T	May affect, likely to adversely affect
Anthus spragueii	Sprague's pipit	Can.	May affect, but not likely to adversely affect
Designated Critical Habitat			**Determination of Effect**
Canis lupus (gray wolf)			May affect, likely to adversely affect

(1) "E" refers to federally-listed as endangered, "T" refers to federally-listed as threatened, "Can" refers to federal candidate species.

6.1 Gray Wolf

As previously mentioned, gray wolves have been documented within the vicinity of the Study Area and designated critical habitat for gray wolf is present throughout the Central Section and in the northern portion of the East Section of the proposed Project.

6.1.1 Construction Impacts

No direct impacts on gray wolf individuals or populations are anticipated from construction of the proposed Project. Potential temporary indirect impacts associated with construction of the proposed Project could include displacement resulting from construction activities that generate disturbances such as noise and dust. It is likely that gray wolves and their prey would temporarily abandon habitats adjacent to where construction activity is occurring. Construction activity occurring adjacent to wolf dens during the breeding season could lead to reproductive failure or abandonment of offspring.

Potential long-term indirect impacts on gray wolves could result from loss, conversion, and fragmentation of habitat. The proposed Project would require permanent removal of forest within the 200-foot ROW (Action Area). At a maximum, approximately 2,100 acres of critical habitat designated for gray wolf would

be directly impacted during construction of the proposed Project; this represents approximately 0.04 percent of the critical habitat designated for gray wolf in the state of Minnesota. The removal of forest in the Action Area would reduce the amount of habitat available for wolves and their prey; however, given the abundance of forested habitat within and adjacent to the Study Area, the loss of forested habitat would not be significant.

Removal of forested land in the Action Area would result in habitat fragmentation, which could reduce the quality of gray wolf habitat, particularly in designated critical habitat in the Central Section and the northern portion of the East Section. The effects of fragmentation on gray wolves would generally be greatest where new corridors are created, rather than where the transmission line would parallel an existing corridor, where the forest has already been fragmented. However, the creation of corridors could create open habitat patches which may be favorable to deer and other gray wolf prey sources.

6.1.2 Operations and Maintenance Impacts

No direct impacts on wolf individuals or populations are anticipated from operation and maintenance of the proposed Project. Potential indirect impacts associated with operation and maintenance of the proposed Project could include temporary displacement of wolves and their prey until maintenance activities are completed. Human access would be limited to construction and maintenance activities.

6.2 Canada Lynx

According to the MnDNR Lynx Sightings Database (MnDNR 2006), Canada lynx have been documented within the counties where the proposed Project is located. As mentioned above, no designated critical habitat for Canada lynx is present in the Study Area (Map 5).

6.2.1 Construction Impacts

No direct impacts on Canada lynx individuals or populations are anticipated from construction of the proposed Project. Potential temporary indirect impacts associated with construction of the proposed Project could include displacement resulting from construction activities that generate disturbances such as noise and dust. It is likely that lynx and their prey would temporarily avoid habitats adjacent to construction areas. Construction activity occurring adjacent to Canada lynx dens during the breeding season could lead to reproductive failure or abandonment of offspring.

Potential long-term indirect impacts on Canada lynx could result from loss, conversion, and fragmentation of habitat. The proposed Project would require permanent removal of forest within the 200-foot ROW (Action Area). The removal of forest in the Action Area would reduce the amount of habitat available for Canada lynx and their primary prey, snowshoe hare; however, given the abundance of forested habitat within and adjacent to the Study Area, the loss of forested habitat would not be significant.

Removal of forested land in the Action Area would result in habitat fragmentation, which could reduce the quality of Canada lynx habitat and its primary prey, snowshoe hare. The effects of fragmentation on Canada lynx would likely be greatest where new corridors are created, rather than where the transmission line would parallel an existing corridor, where the forest has already been fragmented. In addition,

creation of new corridors may lead to an influx of coyotes, wolves, and other wildlife that would not typically inhabit these areas, which could lead to an increase in competition with Canada lynx for a limited supply of winter prey.

6.2.2 Operations and Maintenance Impacts

No direct impacts on Canada lynx individuals or populations are anticipated from operation and maintenance of the proposed Project. Potential indirect impacts associated with operation and maintenance of the proposed Project could include temporary displacement of Canada lynx and snowshoe hare until maintenance activities are completed. Human access would be limited to construction and maintenance activities.

6.3 Northern Long-Eared Bat

As mentioned above, according to the NHIS database, the nearest documented record of a northern long-eared bat is in St. Louis County in the Soudan Underground Mine State Park, which is approximately 45 miles east of the Study Area.

6.3.1 Construction Impacts

In order to avoid potential direct impacts to roosting northern long-eared bats and their pups, the Applicant has made a commitment to avoid tree clearing during the pup season in June and July. The Applicant intends to clear trees in the winter months, outside of the bat's maternal roosting period from April 1 through September 30, to the extent practicable, but will likely need to conduct tree clearing during other times of the year.

The Applicant has committed to conducting acoustical surveys to determine the utilization of potential northern long-eared bat habitat for clearing trees during the maternal roosting period, but outside of the pup season. The Applicant would conduct surveys for three nights for every one kilometer of suitable forested habitat. If no northern long-eared bats are detected during the surveys, forest clearing would be permitted in this area; if northern long-eared bats are detected, then a three mile buffer would be placed around the survey area and cutting would be prohibited outside of the winter months in this area.

6.3.2 Operations and Maintenance Impacts

There would be no direct impacts to northern long-eared bats anticipated from the operations or maintenance of the proposed Project. This is because tree clearing that may potentially affect northern long-eared bat would have occurred during construction, and would not expand during operations and maintenance. Woody vegetation encroaching upon the ROW between maintenance events would not be expected to reach the minimal tree diameter criteria (less than or equal to 3 inches diameter at breast height) for suitable northern long-eared bat summer roost habitat.

6.4 Sprague's Pipit

As mentioned above, the MnDNR database indicates that there is one documented sighting of a Sprague's pipit in the western part of the Study Area. Suitable habitat for Sprague's pipit is generally not present in the Central and East Sections. There is no designated critical habitat for Sprague's pipit.

6.4.1 Construction Impacts

No direct impacts on Sprague's pipit individuals or populations are anticipated from construction of the proposed Project. Potential temporary indirect impacts associated with construction of the proposed Project could include displacement resulting from construction activities that generate disturbances such as noise and dust. The impacts of noise and dust on wildlife are largely unknown. It is likely that Sprague's pipits would temporarily avoid habitats adjacent to construction areas. Construction activities occurring during the nesting season (April through August), could disturb Sprague's pipit nest sites within or adjacent to the Action Area. If an active Sprague's pipit nest is found during construction, the appropriate agencies would be contacted before any actions are taken to determine appropriate avoidance or minimization measures.

Potential permanent impacts on Sprague's pipit habitat could occur in areas where transmission line structures are placed in prairie or grassland habitat. Because Sprague's pipits inhabit prairie and grassland habitats, generally devoid of woody vegetation, removal of forested and shrubland in the Action Area is not likely to adversely affect this species. In contrast, creation of corridors could benefit Sprague's pipit by increasing available habitat, especially in the Central and East Sections, where prairie and grassland vegetation is not abundant.

6.4.2 Operations and Maintenance Impacts

No direct impacts on Sprague's pipit individuals or populations are anticipated from operation and maintenance of the proposed Project. Potential indirect impacts associated with operation and maintenance of the proposed Project could include temporary displacement of Sprague's pipit until maintenance activities are completed. Human access would be limited to construction and maintenance activities. Because Sprague's pipit is a ground-nesting bird, maintenance activities, such as ROW clearing, should be avoided during the nesting season in areas where suitable Sprague's pipit habitat is present within the ROW.

7.0 Cumulative Effects

Reasonably foreseeable future activities that might occur in the proposed Project area and an assessment of cumulative effects from such when combined with the proposed Project are described in Section 7 of the EIS (DOE 2015). State, local, and private activities (i.e., non-federal activities) that are reasonably certain to occur within the Action Area are provided below. The types of reasonably foreseeable future projects include roadways, railroad lines, industrial facilities, and energy projects such as power plants, transmission lines, and pipelines.

The Minnesota Department of Transportation (MnDOT) Statewide Transportation Improvement Program (STIP) identifies various transportation projects in the vicinity of the proposed Project for the period of 2015-2018 (MnDOT 2014). Review of the planned projects for MnDOT District 1 and District 2 identified that planned transportation projects generally consist of routine maintenance activities such as roadway re-surfacing, asphalt surface treatment, bridge repair, bituminous overlay, mill and overlay, concrete paving, railroad crossings, signage, and pedestrian/bike trail improvements. Based on the STIP, there are no major roadway projects presently planned or reasonably foreseeable within the vicinity of the proposed Project.

The Minnesota DOC project database was reviewed to identify any power plant, transmission line, pipeline, or wind projects currently open or permitted in the vicinity of the proposed Project. One power plant and the associated transmission line and natural gas pipeline (Excelsior Energy's Mesaba Project) and one 230 kV transmission line (Minnesota Power's Nashwauk Project) have been issued route permits by the MN PUC but have not yet been constructed. Sections of the approved routes for both of these projects are within the Applicant's proposed routes, and are reasonably foreseeable projects that could occur in the vicinity of the proposed Project, as described below:

- On March 12, 2010, the MN PUC issued a large electric power generating plant site permit to Excelsior Energy to construct the Mesaba Project in Itasca County. The Mesaba Project was originally proposed as a 1,200 megawatt (net) coal-feedstock integrated gasification combined cycle power plant. In addition to the site permit, the MN PUC also issued a pipeline permit and a route permit for a 345 kV transmission line to connect the proposed power plant into the Blackberry Substation. Construction has not started on the power plant, the natural gas pipeline, or the transmission line.

  On May 31, 2012, the MN PUC received a letter from Excelsior Energy stating that it intends at this time to develop only the combined-cycle power block portion of the project, eliminating the syngas production portions (i.e., gasification island, air separation unit, coal/pet-coke feedstock handling and storage, syngas treating unit, sulfur recovery and tail gas recycle units, etc.) of the project and operating the facility as a natural gas-fueled combined-cycle. Excelsior Energy also indicated that it plans to construct the coal gasification island if and when it becomes feasible to do so from economic and regulatory standpoints. Minnesota Statute 216B.1694, Subdivision 3, states that the site and route permits and water appropriation approvals for an innovative energy project must also be deemed valid for a power plant meeting the requirements of paragraph (a)

and shall remain valid until the earlier of (i) four years from the date the final required state or federal preconstruction permit is issued or (ii) June 30, 2019.

The permitted route for Excelsior Energy's approximately 10-mile long 345 kV transmission line would be located within the Proposed Blue Route and Proposed Orange Route for about 1.2 miles in the Balsam Variation Area and would be within the entire length (approximately 5.5 miles) of the Proposed Blue Route in the Blackberry Variation Area.

- Under an agreement with the Nashwauk Public Utilities Commission, Minnesota Power constructed three of four 230 kV transmission lines and two 230 kV substations to supply electric power to an Essar Steel Minnesota project. A fourth transmission line has been permitted by the MN PUC but has not yet been constructed. This potential fourth transmission line would begin at the existing Minnesota Power 230 kV Blackberry Substation (Township 55 North, Range 23 West, Section 19) and continue northeast and parallel two existing Minnesota Power 115 kV transmission lines (the 63 Line and the 62 Line), terminating at the Essar Steel Minnesota project.

  According to the MN PUC route permit, if this fourth transmission line for the Essar Steel Minnesota project is built, the existing 62 line, located west of the 63 Line, would be dismantled. The potential fourth 230 kV transmission line would then be constructed within the former 62 Line ROW and would, therefore, not result in the creation of a new ROW.

  For this potential fourth 230 kV transmission line, the permitted route would be located within the Proposed Orange Route for approximately two miles, from the Blackberry Substation northeast to near the north end of Little Sand Lake.

There are also areas where iron ore is mined and extracted from previously developed stockpiles, basins, underground workings, or open pits ("scram" mining) near the west side of the Canisteo Pit, located approximately four to six miles west of the proposed routes and variations. The Balsam Variation, which is in the Balsam Variation Area, would cross a 115 kV transmission line recently constructed to serve one of these scram mining facilities. All other proposed routes and variations are located more than four miles east of existing or proposed scram mining facilities in the area.

Finally, the USFS, MnDNR, and counties work together to manage forest resources in the vicinity of the proposed Project, including negotiating private logging contracts on public land. Generally, forestry operations occur on both private and public land and involve harvesting of forests for merchantable timber sales on state land enrolled in MnDNR Forestry Timber Sales Program. Forestry operations on these public lands also include land management activities aimed at improving or maintaining attributes such as water quality, tree species and structural diversity, as well as wildlife habitat enhancement. In addition, Beltrami County and Itasca County, and the other project counties have developed forest management plans that provide the general framework for sustainable forestry, including logging activities.

7.1 Summary of Cumulative Effects

With the exception of scheduled MnDOT road maintenance activities and USFS and MnDNR forest management activities, the reasonably foreseeable future actions would all occur in the southern part of the East Section. In this location there is no designated critical habitat for gray wolf or any other federally-listed species. The Proposed Action when combined with other reasonably foreseeable actions would not contribute to cumulative adverse effects on federally-listed species as long as multiple projects are not constructed concurrently. If reasonably foreseeable projects are constructed independent of one another, cumulative adverse effects on gray wolf, Canada lynx, and northern long-eared bat are not expected to be significant because impacts for each project would be localized and forest habitat is abundant in the vicinity.

The proposed Project, when considered with any other project that may involve tree removal, could contribute to cumulative impacts to the gray wolf and Canada lynx, which rely on forested habitat. In addition, while white-nose syndrome is the primary threat to the northern long-eared bat, tree removal contributes to loss of habitat for the species. If trees are cleared simultaneously for multiple projects within close proximity to one another, cumulative impacts to these species could be significant. Avoidance, minimization, and mitigation measures for federally listed species would be coordinated with the USFWS.

The proposed Project when combined with other reasonably foreseeable actions would not contribute to cumulative adverse effects on Sprague's pipit. Prairie and grassland communities, the desirable Sprague's pipit habitat, are generally only present in the West Section and no reasonably foreseeable future actions are planned in this area.

8.0 Conclusions

8.1 Effects Determination for Federally-Listed Species

Based on the description of the proposed Project in Section 2 of this BA and further described in the associated EIS (DOE 2015), the status of species and environmental baseline described in Sections 4 and 5 of this BA, and the analysis of potential impacts in Section 6 of this BA, the DOE concludes the following:

- The proposed Project would have no effect on Poweshiek skipperling, piping plover, or the western prairie fringed orchid.
- The proposed Project may affect but is unlikely to adversely affect, the gray wolf. Clearing of forested land in the Action Area would result in a slight reduction of suitable gray wolf habitat. The habitat that would be lost is not uncommon in the surrounding areas or within northern Minnesota.
- The proposed Project may affect but is unlikely to adversely affect, the Canada lynx. Clearing of forested land in the Action Area would slightly reduce the amount of suitable habitat available for Canada lynx. The habitat that would be lost is not uncommon in the surrounding areas or within northern Minnesota, nor is it designated critical Canada lynx habitat.
- The proposed Project may affect, and is likely to adversely affect, the northern long-eared bat. The Applicant intends to clear trees in the winter months, to the extent practicable, and has made a commitment to avoid tree clearing during the pup season of June and July. As described in Section 6.3 of this BA, the Applicant has agreed to conduct acoustical surveys prior to clearing trees outside of the winter months.
- The proposed Project may affect but is unlikely to adversely affect, Sprague's pipit. There is minimal habitat present for this species within the Study Area and only one record has been documented in the Study Area. Available habitat may increase as a result of creation of open corridors with non-woody vegetation. If an active Sprague's pipit nest is found during construction or maintenance, the appropriate agencies would be contacted before any actions are taken to determine appropriate avoidance or minimization measures.

8.2 Effects Determination for Critical habitat

The proposed Project would travel through critical habitat designated for gray wolf. There is no designated or proposed critical habitat for Canada lynx, northern long-eared bat, or Sprague's pipit in the Study Area.

The proposed Project may affect and is likely to adversely affect critical habitat designated for gray wolf. Clearing forested land in the Action Area would reduce the amount of critical habitat in the region and statewide. The proposed Project would not adversely affect any of the critical factors identified by the USFWS for the long-term survival of gray wolf, as outlined above in Section 4.2 of this BA.

9.0 References

Baicich, P.J., and C.J. Harrison. 2005. Nest, Eggs, and Nestlings of North American Birds. Princeton, NJ: Princeton University Press.

Bent, A.C. 1950. Life histories of North American wagtails, shrikes, vireos, and their allies. US National Museum Bulletin, 197.

Berg, W.E., and D.W. Kuehn. 1982. Ecology of Wolves in North-central Minnesota. Pages 4-11 *in* Wolves of the World: Perspectives of Behavior, Ecology, and Conservation (F.H. Harrington and P.C. Paquet, Editors). Noyes, Park Ridge, New Jersey.

Burdett, C.L. 2007. Hierarchical Structure of Canada Lynx Space Use and Habitat Selection in Northeastern Minnesota. Ph.D. Dissertation, University of Minnesota, St. Paul.

Cuthbert, F.J., and T Weins. 1982. Status and breeding biology of the piping plover in Lake of the Woods County. Report submitted to the Nongame Wildlife Program, Minnesota Department of Natural Resources.

Davis, S.K. 2004. Area sensitivity in grassland passerines: effects of patch size, patch shape, and vegetation structure on bird abundance and occurrence in southern Saskatchewan. Auk 121:1130-1145.

Department of Energy. 2015. Great Northern Transmission Line Draft Environmental Impact Statement

Elliot-Smith, E., S. M. Haig, and B. M Powers. 2009. Data from the 2006 International Piping Plover Census." (USGS) Staff Published Research, no. 662.

Erb, J. 2008. Distribution and abundance of Wolves in Minnesota, 2007-08. Minnesota Department of Natural Resources, Grand Rapids, Minnesota. 11 pp.

Erb, J. and B. Sampson. 2014. Distribution and Abundance of Wolves in Minnesota, 2013-14. Minnesota Department of Natural Resources, St. Paul.

Erb, J. and B. Sampson. 2013. Distribution and Abundance of Wolves in Minnesota, 2012-13. Minnesota Department of Natural Resources, St. Paul.

Fuller, T.K., W.E. Berg, G.L. Radde, M.S. Lenarz, and G.B. Joselyn. 1992. A History and Current Estimate of Wolf Distribution and Numbers in Minnesota. Wildlife Society Bulletin 20:42-54.

Hull, C. 1981. Great Lakes Piping Plover in Trouble. Lansing, MI: Michigan Department of Natural Resources.

Mech, L.D. 1974. *Canis lupus*. American Society of Mammalogists, Mammalian Species No. 37. 6 pp.

Minnesota Department of Natural Resources (MnDNR). 2015a. Rare Species Guide: *Canis lupus* (gray wolf). Accessed April, 2015 at:
http://www.dnr.state.mn.us/rsg/profile.html?action=elementDetail&selectedElement=AMAJA01030

MnDNR. 2015b. Rare Species Guide, *Charadrius melodus*. Accessed April 2015 at: http://www.dnr.state.mn.us/rsg/profile.html?action=elementDetail&selectedElement=ABNNB03070

MnDNR. 2015c. Rare Species Guide, *Platanthera praeclara*. Accessed April 2015 at: http://www.dnr.state.mn.us/rsg/profile.html?action=elementDetail&selectedElement=PMORC1Y0S0

MnDNR. 2015d. "Ecological Classification System: Ecological Land Classification Hierarchy." Accessed January 2015 at: <http://www.dnr.state.mn.us/ecs/index.html>.

MnDNR. 2001. Minnesota Wolf management plan. Division of Wildlife, Minnesota Department of Natural Resources, St. Paul, Minnesota. 36 pp. + appendices.

MnDNR 2006. Lynx Sightings Database. Accessed April 2015 at: http://www.dnr.state.mn.us/eco/nhnrp/research/lynx_sightings.html

Moen, R. 2009. Canada Lynx of the Great Lakes Region – 2009 Annual Report. Natural Resources Research Institute Technical Report No, NRRI/TR-2009-40. Duluth, Minnesota.

Moen, R. G., Niemi, and C.L. Burdet. 2008. Canada Lynx in the Great Lakes Region: Final Report. Technical Report No. NRRI/TR-2008-14. Report Prepared for the USDA Forest Service, U.S. Geological Survey, and Minnesota Cooperative Fish and Wildlife Research Unit, and MDNR. Duluth, Minnesota.

National Geographic Society. 1983. Field guide to the birds of North America. Washington, DC: National Geographic Society.

Nordquist, G.E., K.A. Lynch, and C.A. Spak. 2006. Timing and Pattern of Bat Activity at Soudan Underground Mine. Minnesota Department of Natural Resources, Biological Report No. 88.

Peterson, Roger Tory. 2008. Peterson Field Guide to Birds of North America. Boston: Hougton Mifflin.

Rich, T. D., C. J. Beardmore, H. Berlanga, P. J. Blancher, M. S. W. Bradstreet, G. S. Butcher, D. W. Demarest, E. H. Dunn, W. C. Hunter, E. E. Iñigo-Elias, J. A. Kennedy, A. M. Martell, A. O. Panjabi, D. N. Pashley, K. V. Rosenberg, C. M. Rustay, J. S. Wendt, T. C. Will. 2004. Partners in Flight North American landbird conservation plan. Ithaca, NY: Cornell Lab of Ornithology.

Robbins, M. B. 1998. Display behavior of male Sprague's Pipits." Wilson Bulletin, 435-438.

Sutter, G.C. 1996. Habitat selection and prairie drought in relation to grassland bird community structure and the nesting ecology of Sprague's Pipit, *Anthus spragueii*. PhD Thesis, Regina: University of Regina, Regina, Saskatchewan.

U.S. Fish and Wildlife Service (USFWS). 2015a. U.S. Fish and Wildlife Service. Endangered Species Program. Accessed February 2015 at: http://www.fws.gov/midwest/endangered/lists/minnesot-cty.html.

USFWS. 2015b. Information, Planning, and Conservation System (IPaC). Accessed April 2015 at: http://www.fws.gov/ipac/

USFWS. 2015c. Northern Long-eared Bat Fact Sheet. Accessed April 2015 at: http://www.fws.gov/midwest/endangered/mammals/nleb/nlebFactSheet.html

USFWS. 2014a Poweshiek Skipperling Fact Sheet. Fact Sheet. Accessed February 2015 at: http://www.fws.gov/midwest/endangered/insects/posk/PoweshiekSkipperlingFactSheet.html

USFWS 2014b. Piping Plover-Great Lakes Population Breeding Pairs. Accessed February 2015 at: http://www.fws.gov/midwest/endangered/pipingplover/pipl2007pop.html

USFWS. 2013. Endangered Species Program. Canada Lynx Fact Sheet. Accessed April 2015 at: http://www.fws.gov/mountain-prairie/species/mammals/lynx/

USFWS. 2012. Endangered Species Program. Gray Wolf Fact Sheet. Accessed April 2015 at: http://www.fws.gov/midwest/wolf/grwofactsheets.htm

USFWS. 2007. Determining whether western prairie fringed orchid (*Platanthera praeclara*) may be present in a project area in Minnesota.

USFWS. 2004. Prairie Fringed Orchids Fact Sheet. Accessed February 2015 at: http://www.fws.gov/midwest/endangered/plants/prairief.html

USFWS. 2000. Canada Lynx Conservation Assessment and Strategy.

USFWS. 1992. Recovery Plan for the Eastern Timber Wolf. Twin Cities, Minnesota. 73 pages.

USFWS. 1991. Endangered Species Facts: Piping Plover. Fact Sheet. Accessed February 2015 at: http://www.fws.gov/midwest/endangered/pipingplover/pipingpl.html

U.S. Geological Survey. 2015. National Wildlife Health Center: White-Nose Syndrome. Accessed April 2015 at: http://www.nwhc.usgs.gov/disease_information/white-nose_syndrome/

10.0 Acronyms

AC	alternating current
BA	Biological Assessment
BMP	best management practice
CFR	Code of Federal Regulations
DOC	Minnesota Department of Commerce
DOE	Department of Energy
DPS	Distinct Population Segment
EIS	Environmental Impact Statement
ESA	Endangered Species Act
IPAC	Information, Planning, and Conservation
kV	Kilovolt
MBS	Minnesota Biological Survey
MnDNR	Minnesota Department of Natural Resources
MnDOT	Minnesota Department of Transportation
MN PUC	Minnesota Public Utilities Commission
NESC	National Electric Safety Code
NHIS	Natural Heritage Information System
OSHA	Occupational Safety and Health Administration
ROW	right of way
SNA	Scientific and Natural Area
STIP	Statewide Transportation Improvement Program
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service

USGS	United States Geological Survey
WMA	Wildlife Management Area