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March 8, 2014

Re: PUC Docket Number E-015/CN-12-1163

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

Dear Mr. Storm:

On behalf of The Nature Conservancy, thank you for the opportunity to submit comments for the Great Northern Transmission Line (GNTL). We are pleased to provide these comments as part of the public record.

The mission of The Nature Conservancy is to conserve the lands and waters on which all life depends. Our comments are therefore focused on maintaining critical habitats for plants, animals, and natural communities while also accommodating the energy needs that the GNTL helps our region to address.

The Nature Conservancy acknowledges that addressing the energy needs of northern Minnesota and Manitoba will call for an “all of the above” solution, and the GNTL project may have a role to play in such a strategy.

The GNTL environmental report should pay particular attention to selecting a route alternative that avoids adverse and unnecessary impacts to critical habitats for plants, animals, and natural communities. The Nature Conservancy has provided detailed comments and data layers on the proposed routing alternatives, and proposed a route that meets both energy and habitat conservation needs (see attached letter and maps dated 6/17/2013 and attached e-mail to Jim Atkinson dated 2/28/2014). We request that the environmental report carefully analyze the ability of the GNTL to: 1) Follow existing major roads and transmission corridors (Map 1); 2) Avoid Conservancy Ownerships and Easements (Map 2); 3) Avoid Areas of Outstanding and High Biodiversity Significance (Map 2); 4) Minimize use of Conservancy conservation portfolio sites; where portfolio sites cannot be avoided, direct the new transmission line to existing major roads and transmission corridors (Maps 1 & 2).

We coordinate closely with the Minnesota Department of Natural Resources and with the Nature Conservancy of Canada (NCC). Both partners are therefore copied on this letter. NCC is working with Manitoba Hydro regarding similar criteria and considerations for routing. We will continue to share and exchange information with the MN DNR and NCC over the course of the project.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. T. Shaw', written in a cursive style.

Douglas T. Shaw, Ph.D.
Assistant Chapter Director

C: Peggy Ladner (TNC), Gail Lewellan (TNC), Meredith Cornett (TNC), Cary Hamel (NCC), Jamie Schrenzel (MN DNR), Christina Rolfes (HDR Engineering, Inc.), Jim Atkinson (ALLETE, Inc.)

Attachments:

Copy of signed letter from The Nature Conservancy to ALLETE (dated June 17, 2014)

Copies of Map 1, Map 2, shape file for TNC-preferred routing

Copy of e-mail update from The Nature Conservancy to ALLETE (dated February 28, 2014)