

Appendix U

USFWS Information



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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Bloomington, Minnesota 55437-1458



IN REPLY REFER TO:

AUG 10 2015

FWS/R3/ER15-306

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

Dear Ms. Smith,

The Fish and Wildlife Service (Service) thanks the Department of Energy (DOE) for the opportunity to comment on the Draft Environmental Impact Statement for the Great Northern Transmission Line (GNTL, DOE/EIS 0499). The Service has been closely involved in this project for several years providing technical assistance regarding impacts of this project on important wildlife, resources, and habitat. The Service has submitted four letters to date on this project:

- March 4, 2014: From the Service to the Minnesota Department of Commerce.
- July 1, 2014: From the Service to Minnesota Power (the Applicant).
- August 11, 2014: From Department of Interior (Office of Environmental Policy and Compliance) to DOE (electronically submitted as a draft letter by the Service to DOE November 20, 2014 and again as a signed letter by the Service to DOE July 22, 2015 due to a clerical error).
- August 14, 2014: From the Service to DOE.

In all of these letters, the Service has stated that the GNTL (both construction and long-term use) has the potential to impact Service interest lands, threatened, endangered, or species of concern, migratory birds, bald and golden eagles, wetlands, and wildlife habitat. The Service has emphasized avoidance and minimization of impacts to these resources, as well as appropriate mitigation for impacts that cannot be practicably avoided. The Service continues to stand by these previous comments and recommendations. This letter serves to outline the Service's recommendations on route selection, alignment modification, and additional comments on avoiding and minimizing impacts to migratory birds, listed species, and wetland/vegetation resources. The Service has additionally included a path forward for minimization and mitigation of potential impacts to Service interest lands. The Service makes these recommendations pursuant to the National Wildlife Refuge

Administration Act (NWRA), Endangered Species Act (ESA), Migratory Bird Treaty Act (MBTA), Executive Order (E.O.) 13186, Department of Energy's Migratory Bird Program Partnership Agreement, Bald and Golden Eagle Protection Act (BGEPA), Federal Aid in Wildlife Restoration Act (Pittman-Robertson Act), Federal Aid in Sport Fish Restoration Act (Dingell-Johnson Act), and Fish and Wildlife Act of 1956.

Route Recommendation and Avoidance of Service Interest Lands

The Service administers numerous tracts within the proposed GNTL routing options as part of the National Wildlife Refuge System (NWRS). Service administered and managed lands are acquired for the preservation of wildlife and their habitats. As stated in previous letters (see above), preservation and avoidance of impact to Service interest lands is one of the Service's highest priorities. The Service is supportive of both route alternatives and alignment modifications that maximize avoidance of Service interest lands. The Service favors a weighted tiered approach of avoidance, minimization, and mitigation of impacts.

The Service recommends the following routes and alignments be chosen for the final route selection:

- In the West section of the project, the Service recommends the selection of the Cedar Bend WMA variation, Hop 2 and the Beltrami North Central Variation 4. The Service believes the combination of these variations is the least impactful option with respect to wildlife, wetland, and forestry resources, as compared to the Applicant's preferred route outlined in the DEIS. Additionally, these variations will completely avoid all refuge impacts in the Western Section of this project. Our reasoning is as follows:
 - The Service prefers the Cedar Bend WMA Variation because:
 - It completely avoids Service interest lands and state Wildlife Management Areas (the Applicant-proposed route impacts 6 acres of Service Lands).
 - It impacts less state forest land and wetlands, fewer sites identified by the Minnesota Department of Natural Resources (MN DNR) as having Biodiversity Significance, High Conservation Value Forests, or Native Plant Communities, and fewer wildlife resources.
 - The impacts to listed species are similar to the Applicant's preferred route.
 - This variation will result in an overall shorter route and can be built within an existing ROW.
 - The Service prefers the Beltrami North Central Variation Routes 4 because:
 - It completely avoids Service interest lands (the Applicant-proposed route impacts 18 acres).
 - It impacts fewer rare (plant) species, fewer sites of Biodiversity Significance, fewer overall impacts to forestry, vegetation, wildlife, shrub wetlands, and rare features.

- It impacts less State Forest and State Fee lands.
 - It impacts a similar (but slightly higher) acreage of National Wetland Inventory (NWI) Wetlands (305 vs. 272 acres of the Applicant-proposed route).
 - It can be built within the existing ROW (except for <1 mile stretch).
 - Impacts to federally listed wildlife resources are similar.
 - The Service acknowledges these variations will result in a slightly longer transmission line and will have a greater impact to water resources. Additionally, slightly more emergent and forested wetlands will be impacted (28 and 169 vs. 23 and 119 acres respectively).
- The Service then recommends adoption of the blue route (where Beltrami North Central Variation 4 connects to the Blue Route).
 - In the Central Section of the project the Service recommends utilization of the Silver Creek WMA Alignment Modification to avoid Service interest lands (specifically the parcel located T-160, R-30, S-27)). The Service acknowledges this would create a new ROW and possible habitat fragmentation, but prefers this option to expanding the existing ROW on Service lands.
 - The Service then recommends the Blue Route be followed to the terminus of the project.

These recommendations by the Service should be considered our strongest recommendation and highest priority; not just one in a series of equally weighted options.

Should the above recommendations not be chosen for the final route selection, the Service recommends the following:

- In the West Section: Should the Cedar Bend WMA variation and the Beltrami North Central Variation 4 not be selected, the Service recommends examining the side-by-side comparison of the preferred route with the Beltrami North Variations 1&2, and the preferred route with the Beltrami North Central Variations 1, 2, 3, and 5 (detailed in the DEIS) to determine the least environmentally impactful alternative. Consideration should be given to existing ROW corridors as well as minimization of impact to wetland and forest resources.
- In the Central Section: If the Orange Route is selected as the final route, the Service recommends examining the side-by-side comparison of the proposed Orange Route and the Beltrami South Central and Beltrami South variations to determine the least environmentally impactful alternative. Consideration should be given to existing ROW corridors as well as minimization of impact to wetland and forest resources.
- In the Central Section: If the Orange Route (with the J2 Segment Option) is selected as the final route, the Service recommends the adoption of the Northholm Variation to avoid impacts to Service interest lands. Because neither the J2 Segment nor the Northholm variation parallel existing corridors, the Service would prefer the Service lands not be impacted.