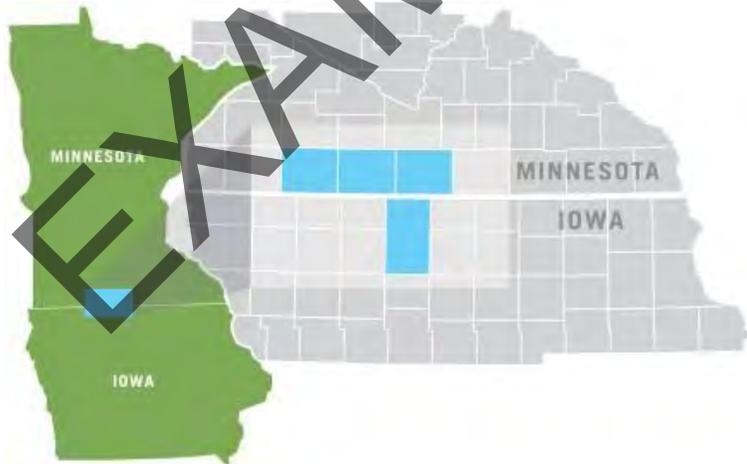


Appendix O

Agricultural Impact Mitigation Plan (AIMP) Example



ITC Midwest LLC
Agricultural Impact Mitigation Plan
Minnesota – Iowa 345 kV
Transmission Project and Associated Facilities
in Jackson, Martin, and Faribault Counties



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

April 29, 2014

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.

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.

ITC Midwest's DEIS Comment Letter

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.

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.

ITC Midwest's DEIS Comment Letter

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.

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:

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.

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

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.

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.

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.

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.

ITC Midwest's DEIS Comment Letter

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.

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.

Appendix P

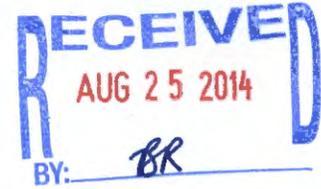
Cultural Resources Report



STATE HISTORIC PRESERVATION OFFICE



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



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, Manager
Government Programs and Compliance

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



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 be 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

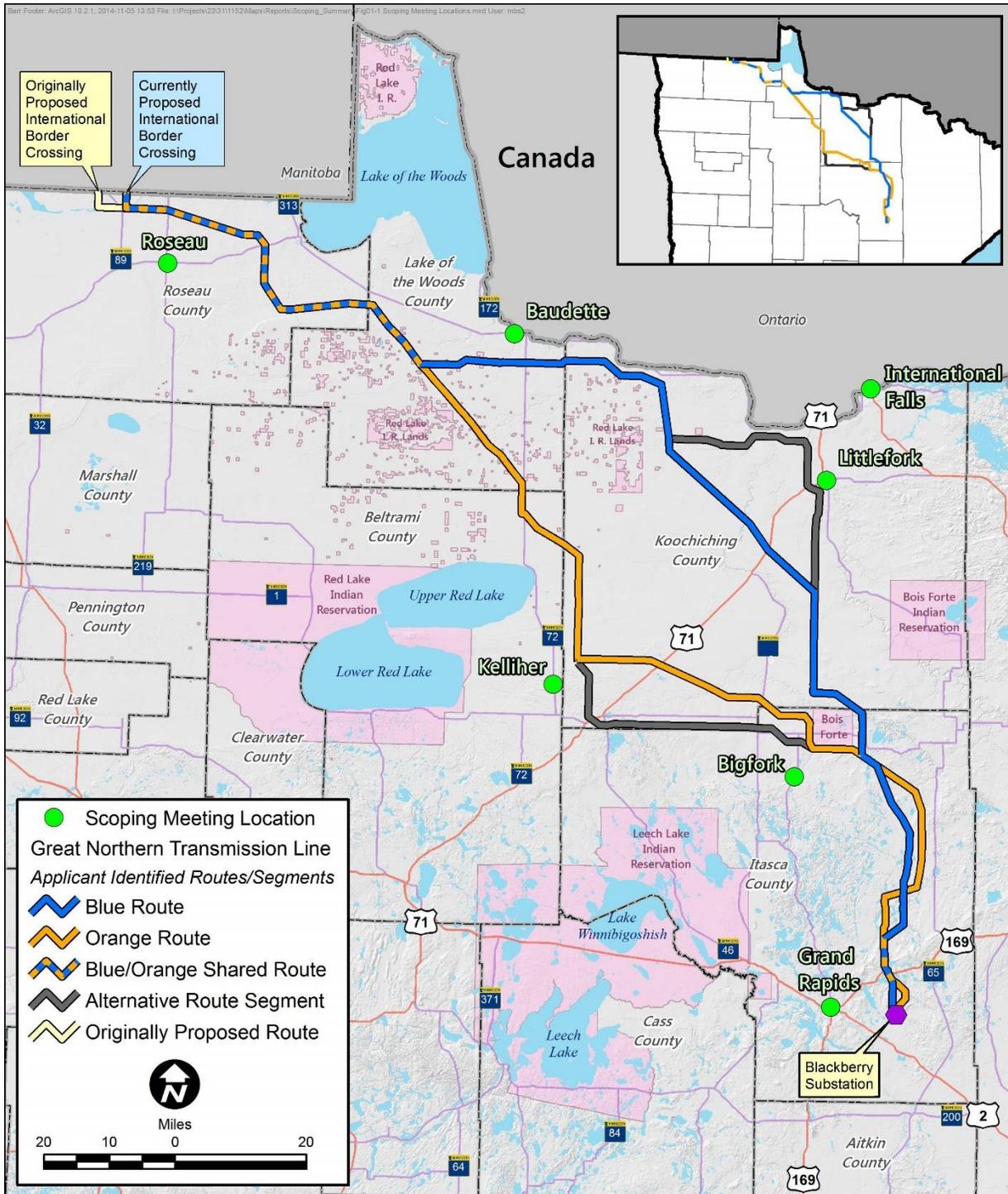


Figure 1-1 Project Regional Map

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 Cultural Resources	Assiniboine and Sioux Tribes of the Fort Peck Reservation
Darrell "Curley"	Youpee	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
	Yellow Bird-		
John	Steele	President	Oglala Sioux Tribal Council of the Pine Ridge Reservation
Audrey	Bennett	NAGPA Cultural Resource	Prairie Island Indian Community in the State of Minnesota
Whitney	White	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
			Spirit Lake Tribe North Dakota
Myra	Pearson	Chairperson	

Federally Recognized American Indian Tribes/THPOs contacted by DOE

		Cultural Resource	
Darrell	Smith	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

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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.

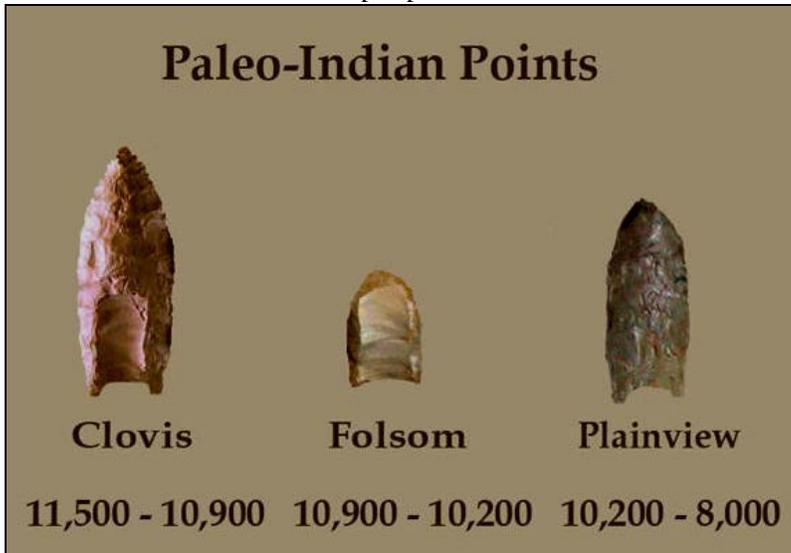


Figure 1. Paleoindian projectile points (Eddins n.d.).

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).

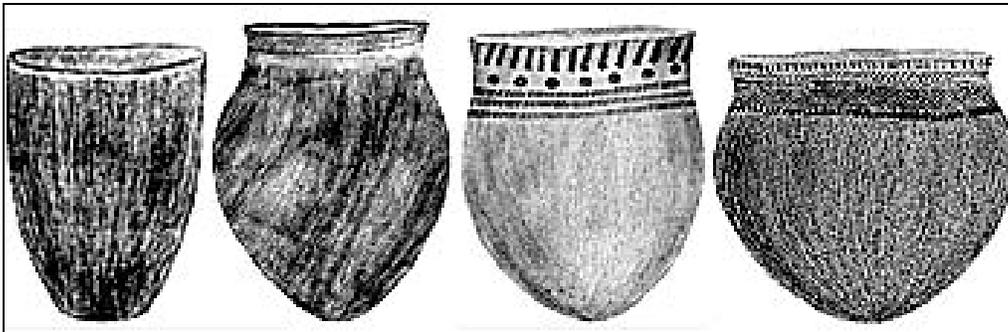


Figure 2. Woodland ceramic pots (MVAC n.d.).

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).

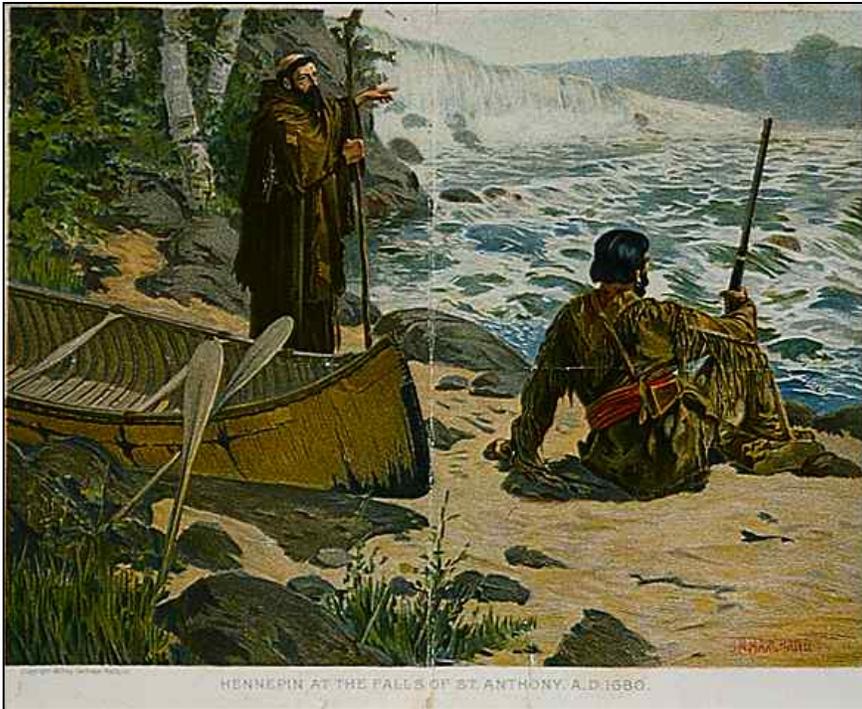


Figure 3. Father Hennepin at St. Anthony Falls (Minnesota Historical Society 1903)

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 <i>Bison occidentalis</i>
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).

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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)

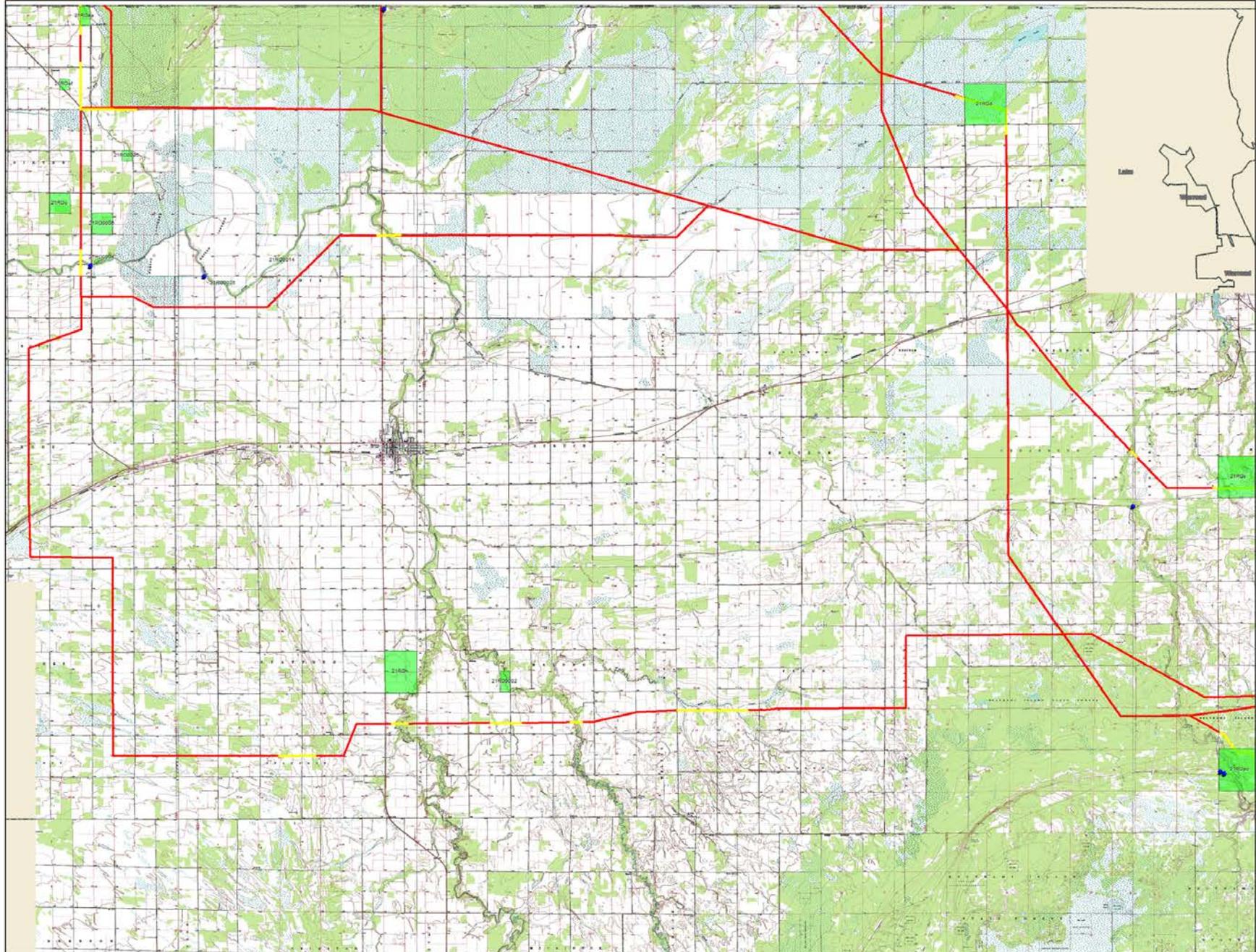
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Appendix A: Maps

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

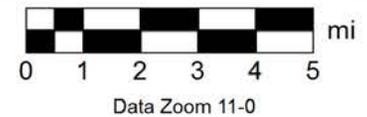
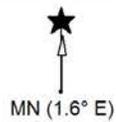
- EIS Alignment depicted in red
- High potential areas depicted in yellow
- Historic sites depicted as blue dots
- Archaeological sites depicted as green polygons
- Archaeological points depicted as red flags

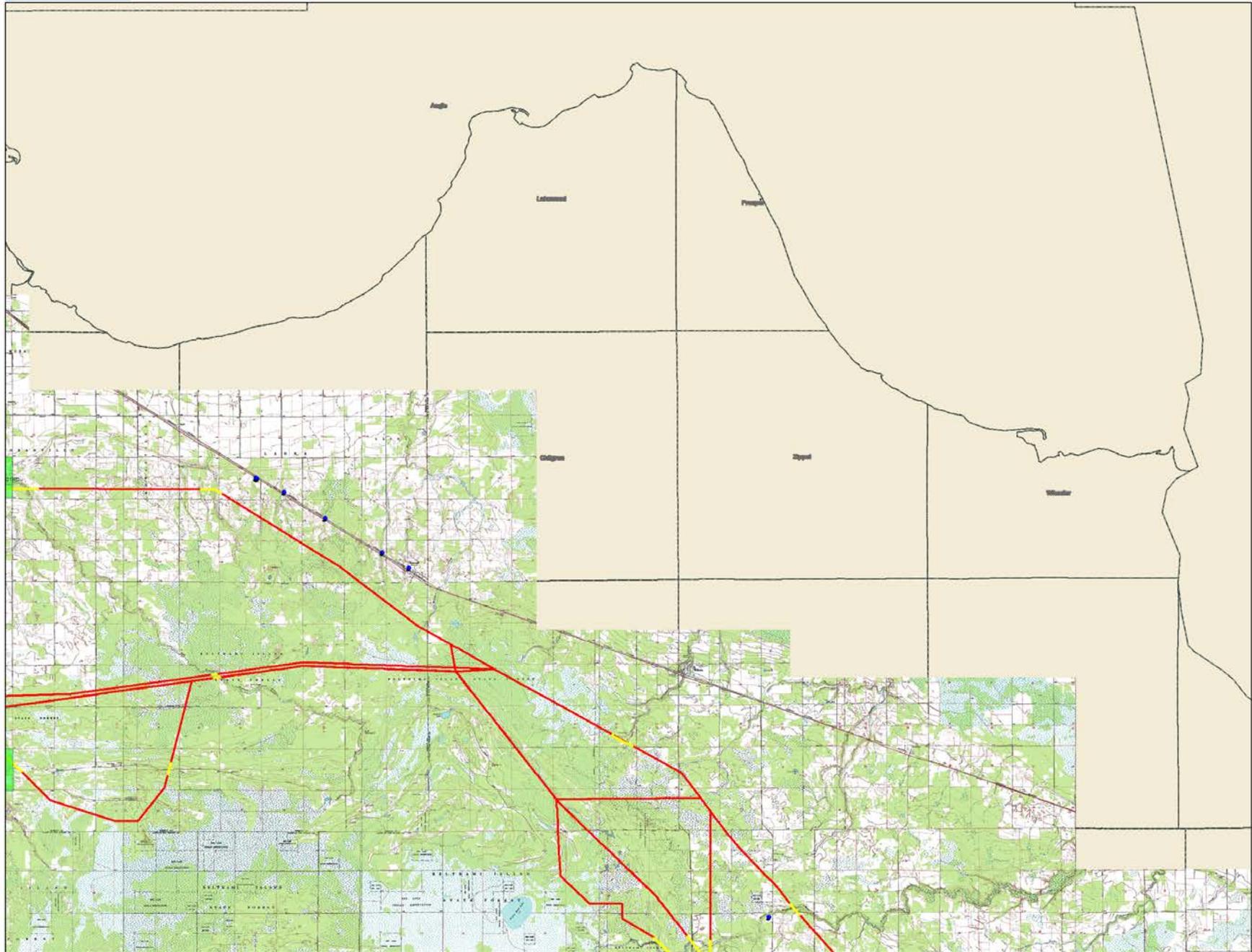


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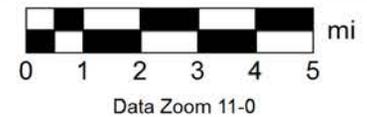
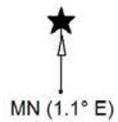


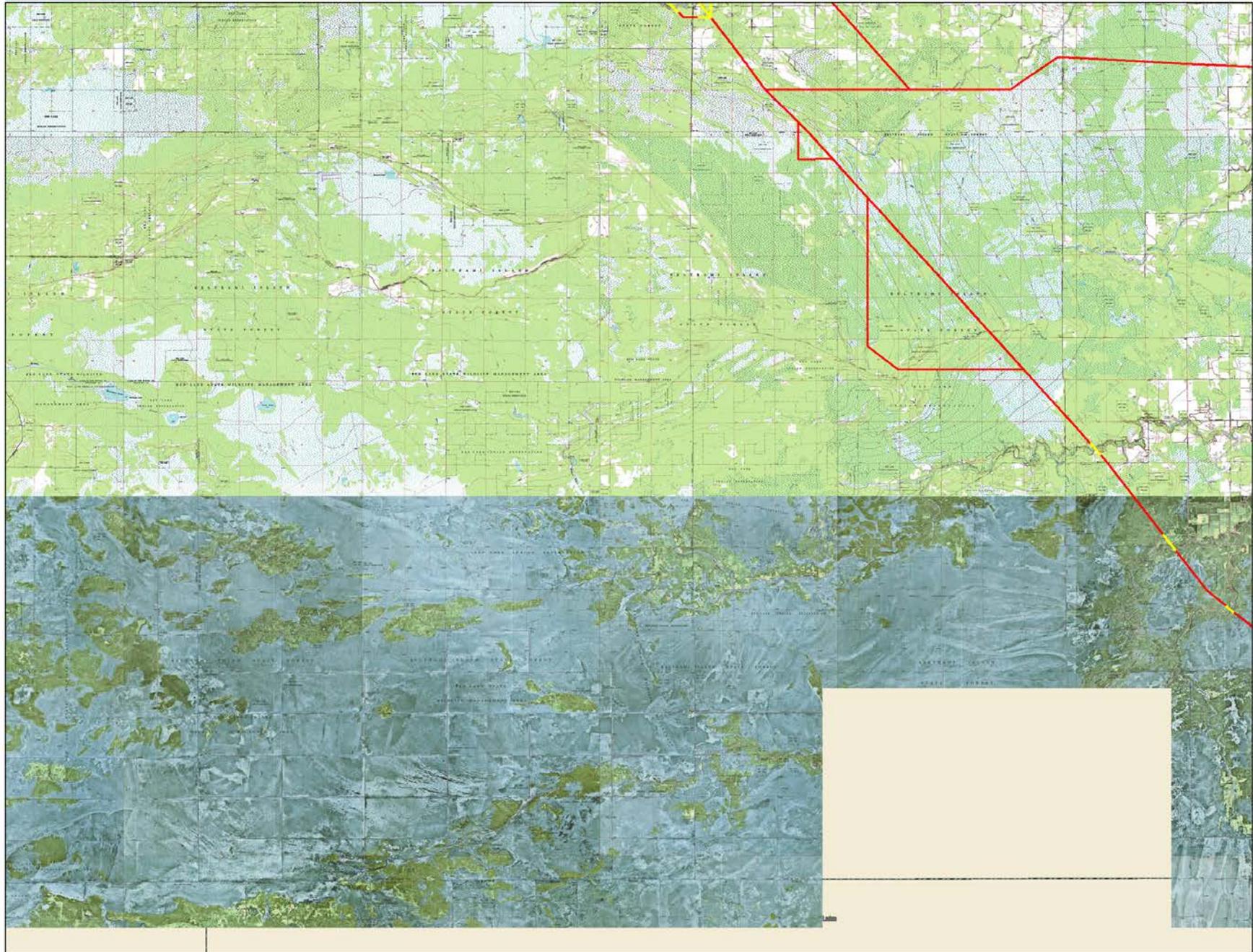


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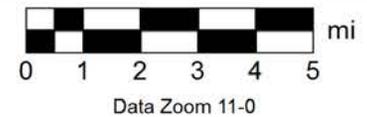




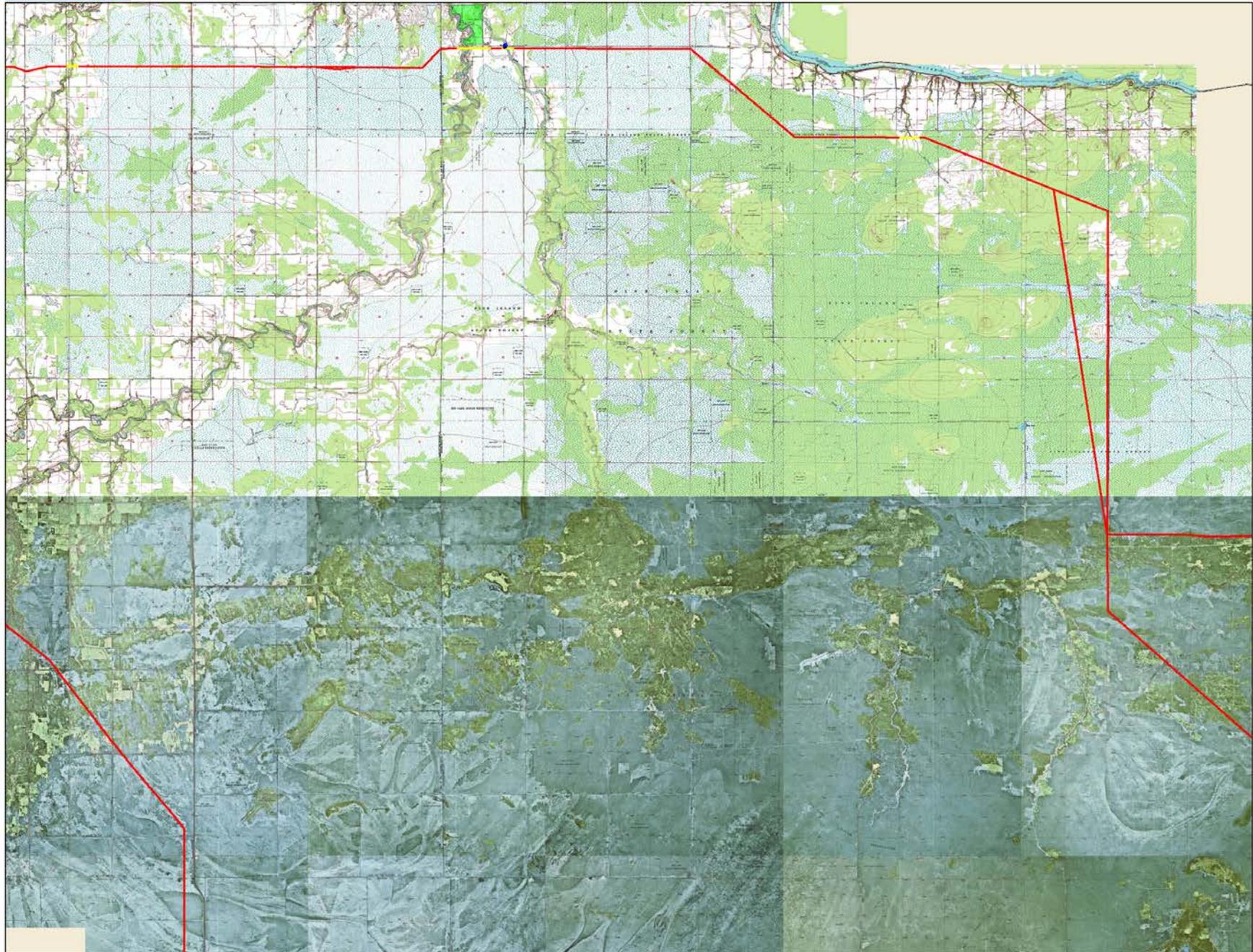
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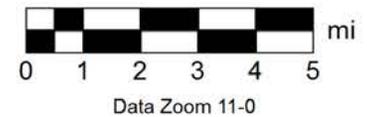
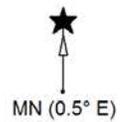
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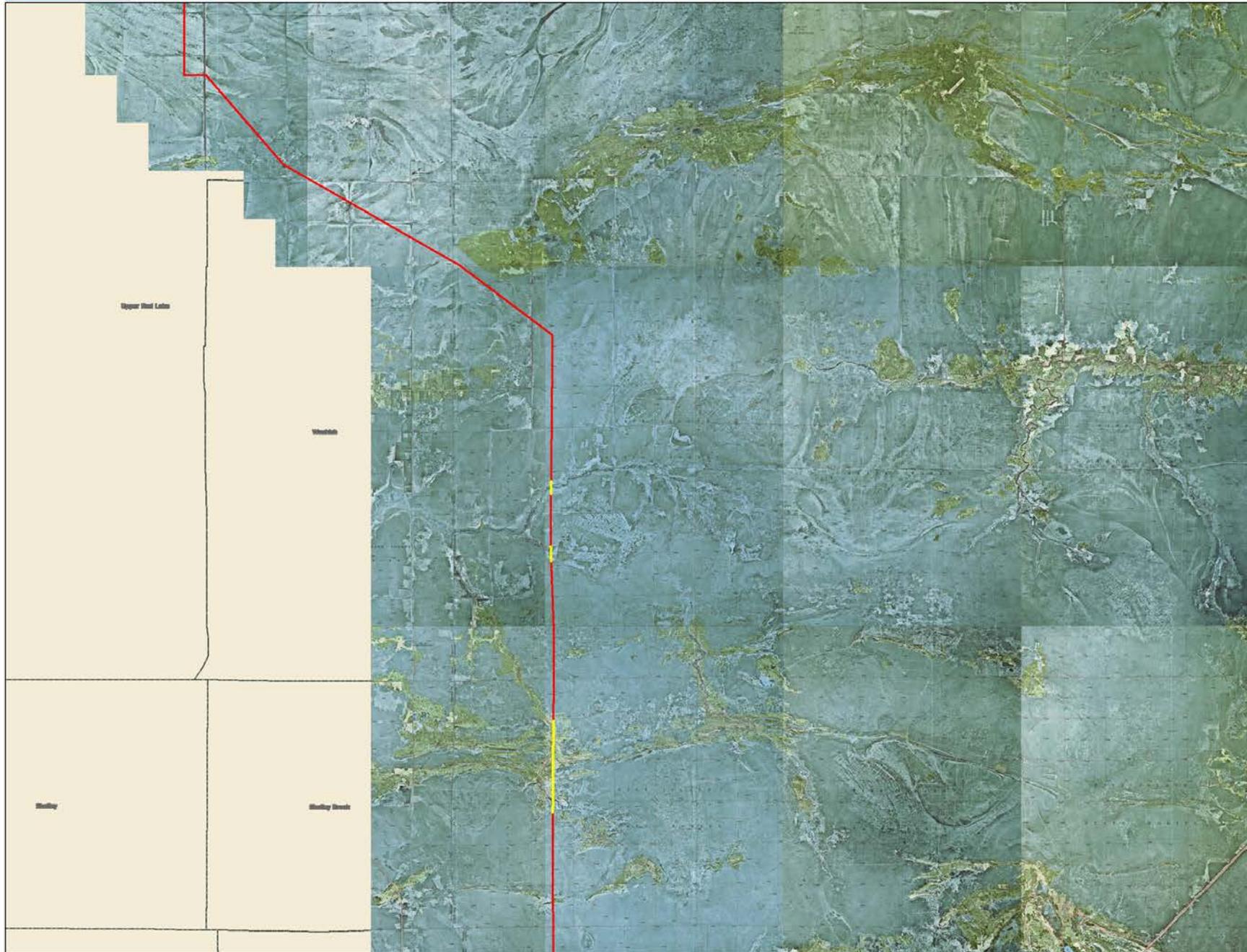
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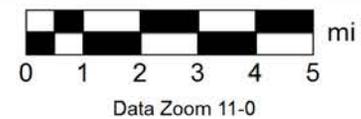
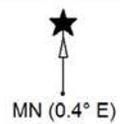




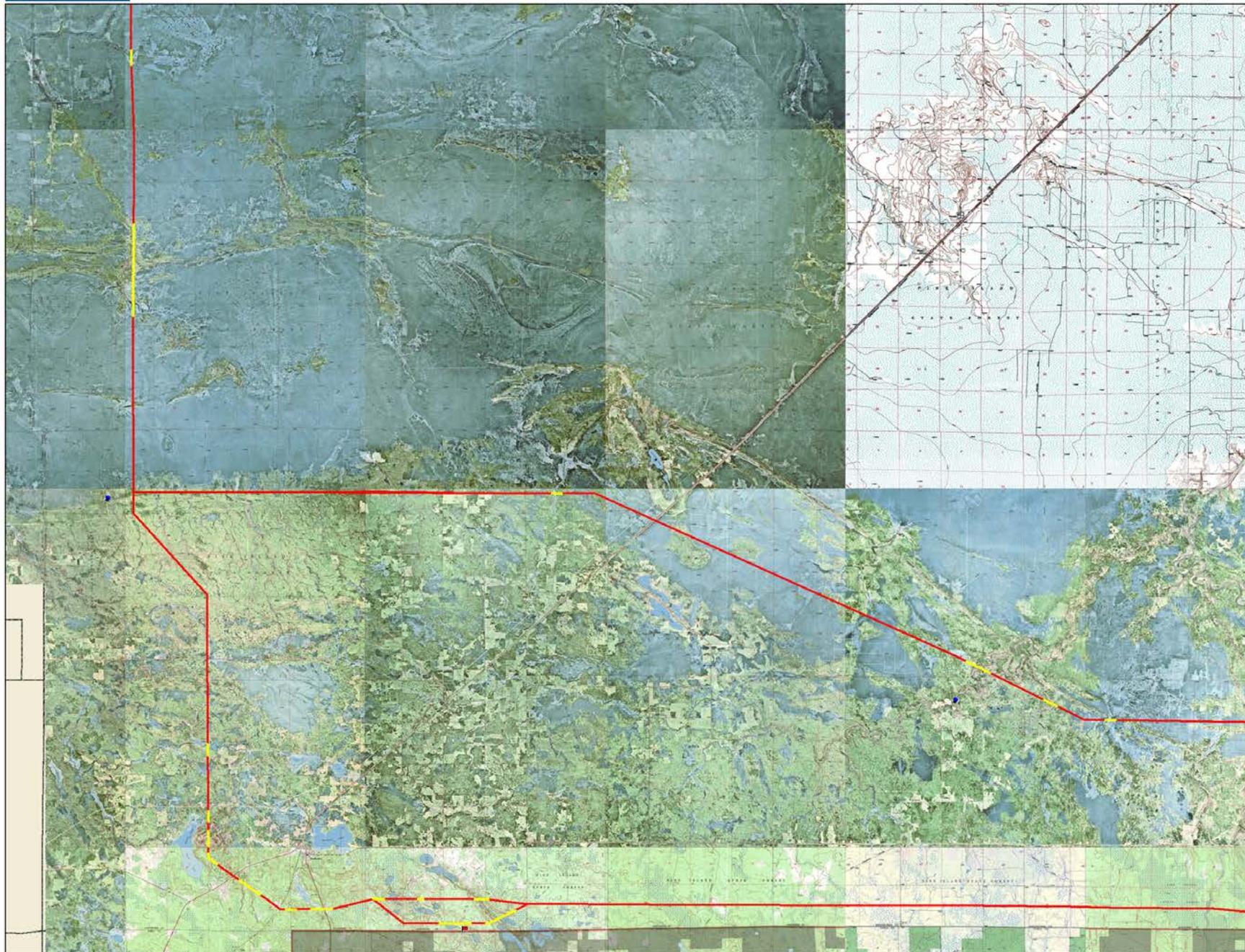
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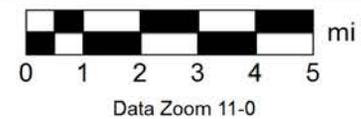
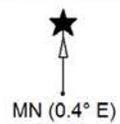
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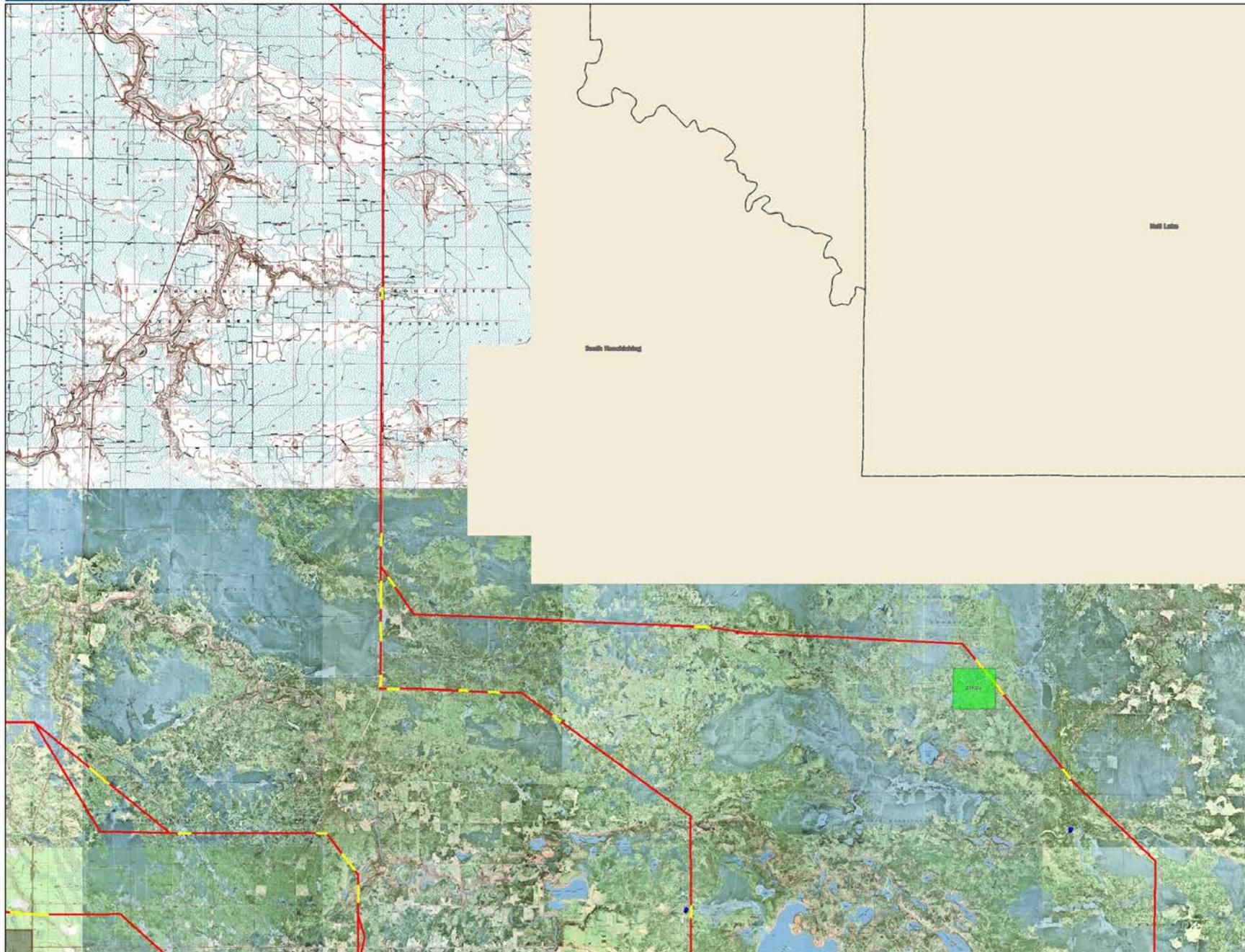


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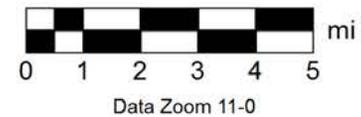
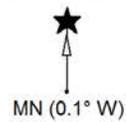


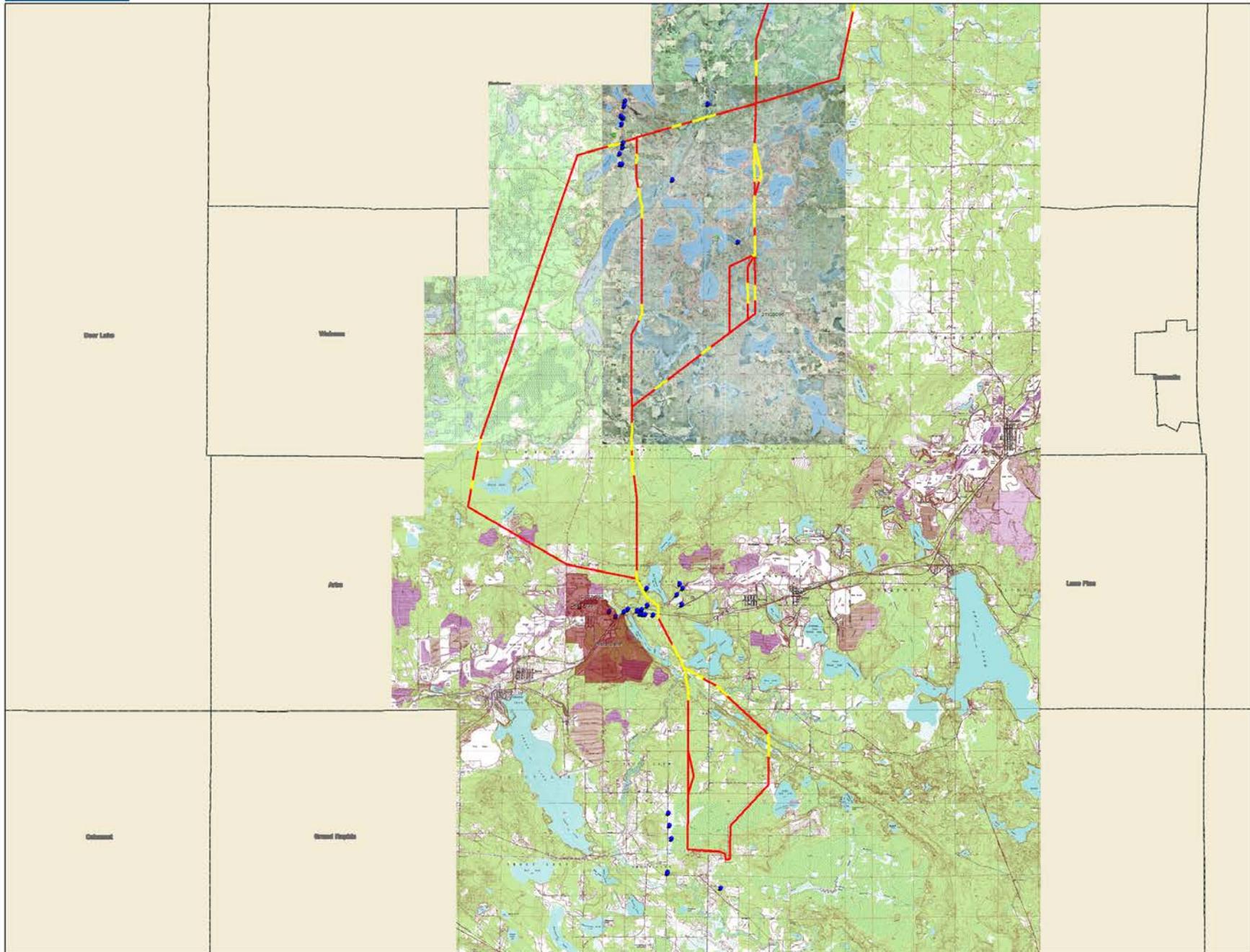


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STATE HISTORIC PRESERVATION OFFICE

December 30, 2014

Ms. Julie Ann Smith
National Electricity Delivery Division, OE-20
Office of Electricity Delivery 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 an 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:

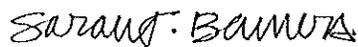
- Office of the State Archaeologist, Minnesota Department of Administration
- Minnesota Indian Affairs Council

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, 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,

A handwritten signature in black ink that reads "Julie A. Smith". The signature is written in a cursive, flowing style.

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.

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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,

A handwritten signature in black ink that reads "Julie A. Smith". The signature is written in a cursive, flowing style.

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.

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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.

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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.

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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.

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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.

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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.

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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.

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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.

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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.

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National Electricity Delivery Division, OE-20
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Department of Energy
Washington, DC 20585

January 13, 2015

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

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U.S. Department of Energy

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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.

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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.

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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.

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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.

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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.

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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.

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National Electricity Delivery Division, OE-20
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U.S. Department of Energy

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- 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.

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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.

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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.

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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.

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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,

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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.

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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.

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- 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.

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Julie Ann Smith, PhD
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National Electricity Delivery Division, OE-20
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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,

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Yours very truly,



Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
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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

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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,

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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).

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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.

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Department of Energy
Washington, DC 20585

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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.

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National Electricity Delivery Division, OE-20
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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.

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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.

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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

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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).

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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.

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Department of Energy
Washington, DC 20585

January 13, 2015

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National Electricity Delivery Division, OE-20
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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.

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Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
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- 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

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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.

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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.

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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.

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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
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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.

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Yours very truly,



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

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Yours very truly,



Julie Ann Smith, PhD
Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
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- 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.

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

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Principal NEPA Document Manager
National Electricity Delivery Division, OE-20
Office of Electricity Delivery and
Energy Reliability
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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.

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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.

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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.

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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.

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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 Commerce 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 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,

A handwritten signature in black ink that reads "Julie A. Smith". The signature is written in a cursive, flowing style.

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.

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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.

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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)

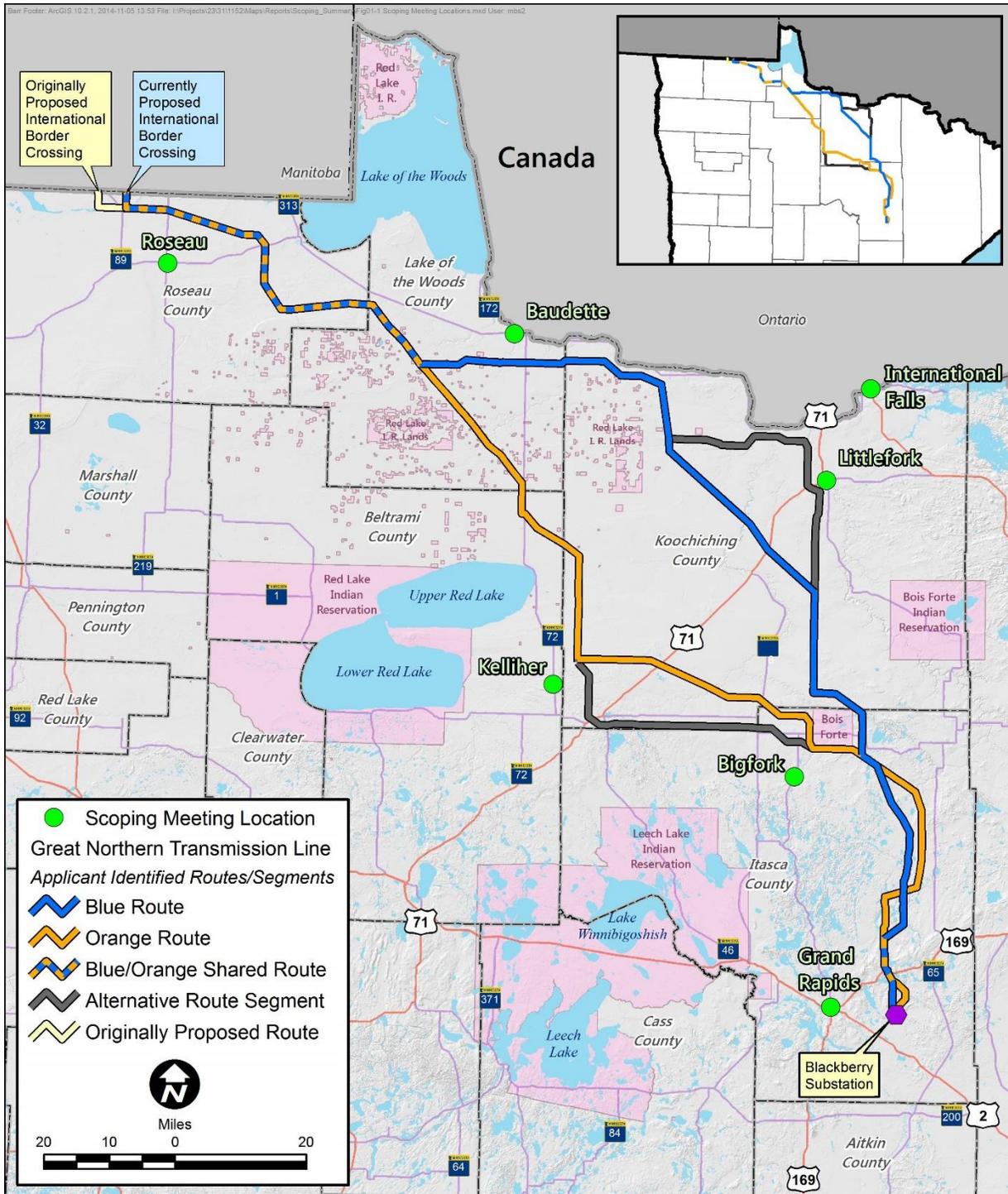
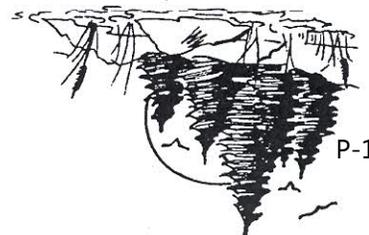


Figure 1-1 Project Regional Map

Kay L. Mack
BELTRAMI COUNTY
ADMINISTRATOR
701 Minnesota Ave NW, STE 200
Bemidji, MN 56601-3178
Telephone: 218-333-4109
FAX: 218-333-4246



P-157

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.

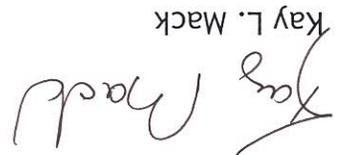
The contact person for this would be:

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 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,

A handwritten signature in black ink that reads "Julie A. Smith". The signature is written in a cursive, flowing style.

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.
Washington, 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,

A handwritten signature in black ink that reads "Charlene Dwin Vaughn". The signature is written in a cursive, flowing style.

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 be 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,

A handwritten signature in black ink that reads "Julie A. Smith". The signature is written in a cursive, flowing style.

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

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 (*Myotis 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 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

Appendix R Biological Assessment

The preparation of the draft Biological Assessment (BA) is underway, however it is not available for this EIS. The draft BA is being prepared in order to determine the impacts of the proposed Project on federally-listed species and to facilitate ESA Section 7 consultation.