

APPENDIX O
IRON RANGE – ST. LOUIS COUNTY – ARROWHEAD 345 KV
TRANSMISSION LINE PROJECT
TRIBAL NATION COORDINATION AND COMMENTS

INDEX

Project Introduction Letter to Tribal Nations with distribution lists

Tribal Nation Responses to Introduction Letter

- 4/23/2025 Email, A. Mason, Bois Forte Tribal Government
- 5/7/2025 Email, B. Rudnicki, Shakopee Mdewakanton Sioux Community
- 5/7/2025 Email, L. Wabasha, Shakopee Mdewakanton Sioux Community
- 5/19/2025 Email, E. Schroeder, Fond du Lac Band of Lake Superior Chippewa

Email Correspondence with Tribal Nations

- 9/2/2025 Email, E. Schroeder, Fond du Lac Band of Lake Superior Chippewa
- 9/2/2025 Email, L. Wabasha, Shakopee Mdewakanton Sioux Community

Phone Call Logs

- 12/9/2025 Phone Call, R. Hull, Grand Portage Band of Ojibwe
- 12/9/2025 Phone Call, G. Lemon, Leech Lake Band of Ojibwe
- 12/9/2025 Phone Call, C. St. John, Lower Sioux Indian Community
- 12/9/2025 Phone Call, M. Wilson, Mille Lacs Band of Ojibwe
- 12/9/2025 Phone Call, N. White, Prairie Island Indian Community
- 12/9/2025 Phone Call, G. Branchaude, Red Lake Nation
- 12/9/2025 Phone Call, S. Odegard, Upper Sioux Community
- 12/9/2025 Phone Call, J. Syverson, White Earth Nation

ISA Project Introduction Letter to Tribal Nations

Tribal Nation	Name	Title	Email
1854 Treaty Authority	Sonny Myers		smyers@1854treatyauthority.org
Bois Forte Band of Chippewa	Cathy Chavers		cchavers@boisforte-nsn.gov
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Bois Forte Band of Chippewa	Shane Drift		sdrift@boisforte-nsn.gov
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Bois Forte Band of Chippewa	Robert Moyer, Jr.		rmoyer@boisforte-nsn.gov
Bois Forte Band of Chippewa	Tara Geshick		tara.geshick@boisforte-nsn.gov
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Fond du Lac Band of Lake Superior Chippewa	Robert Abramowski		robertabramowski@fdlband.org; robabramowski5@gmail.com
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Fond du Lac Band of Lake Superior Chippewa	Scott Buchanan		scottbuchanan@fdlrez.com
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Fond du Lac Band of Lake Superior Chippewa	Wally Dupuis		wallydupuis@fdlband.org
Fond du Lac Band of Lake Superior Chippewa	Earl Otis		earlotis@fdlband.org
Fond du Lac Band of Lake Superior Chippewa	Bruce Savage		brucesavage@fdlband.org
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Fond du Lac Band of Lake Superior Chippewa	Ian Young		ianyong@fdlband.org
Fond du Lac Band of Lake Superior Chippewa	Brad Blacketter		bradblacketter@fdlband.org
Fond du Lac Band of Lake Superior Chippewa	Evan Schroeder	Tribal Historic Preservation Officer	evanschroeder@fdlrez.com
Grand Portage Band of Lake Superior Chippewa	Bobby Deschampe		robertdeschampe@grandportage.com
Grand Portage Band of Lake Superior Chippewa	April McCormick		aprilm@grandportage.com
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Grand Portage Bank of Lake Superior Chippewa	Agatha Armstrong		agathaa@grandportage.com
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Grand Portage Bank of Lake Superior Chippewa	Rob Hull	Tribal Historic Preservation Officer	thpo@grandportage.com
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Leech Lake Bank of Ojibwe	Leonard Fineday		leonard.fineday@llojibwe.net
Leech Lake Bank of Ojibwe	Brandy Tofte		brandy.toft@llojibwe.net
Leech Lake Bank of Ojibwe	Faron Jackson, Sr.		faron.jackson@llojibwe.net
Leech Lake Bank of Ojibwe	Ashley Harrison	Tribal Historic Preservation Officer	ashley.harrison@llojibwe.net
Leech Lake Bank of Ojibwe	Gina Lemon	Tribal Historic Preservation Officer	gina.lemon@llojibwe.net

ISA Project Introduction Letter to Tribal Nations

Tribal Nation	Name	Title	Email
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Shakopee Mdewakanton Sioux Community	Bill Rudnicki		bill.rudnicki@shakopeedakota.org
Shakopee Mdewakanton Sioux Community	Leonard Wabasha	Tribal Historic Preservation Officer	leonard.wabasha@shakopeedakota.org

ISA Project Introduction Letter to Tribal Nations

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White Earth Nation	Nate Mathews		nathan.mathews@whiteearth-nsn.gov
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April 18, 2025

VIA Email

Name
Tribal Nation
Email address

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Name:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission’s approval process.

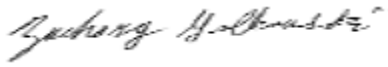
April 18, 2025

Page 2

Cultural Resources Survey: The Applicants have contracted Merjent, Inc. to complete a Phase Ia Literature Review and a Phase I Archaeological Reconnaissance Survey.

I respectfully request your assistance with the identification of information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

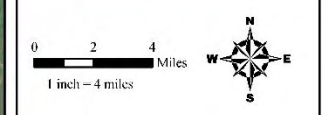
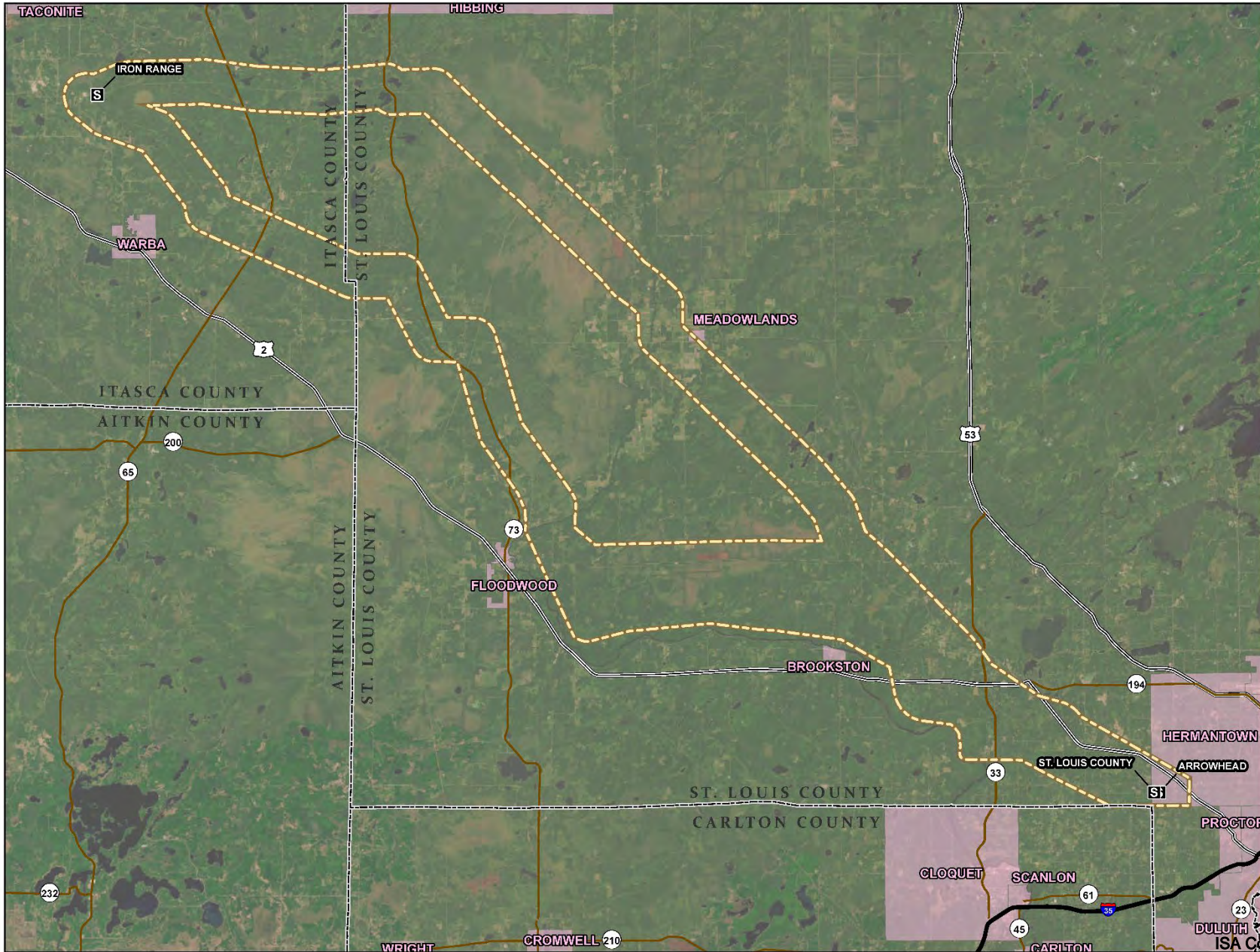
Sincerely,



Zachary Gorkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix O

Page 9 of 44

From: [Zach Golkowski \(MP\)](#)
To: [Amy Mason](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#)
Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Wednesday, April 23, 2025 7:17:39 AM
Attachments: [image001.png](#)

Hi Amy,

Thank you for the response. The ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We are currently requesting feedback from local, state, and federal agencies regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public. We will keep you updated as we narrow down the Study Area and begin detailed routing.

We look forward to any comments you have throughout the routing/permitting process.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366
C: 218-428-5582

From: Amy Mason <amy.mason@boisforte-nsn.gov>
Sent: Tuesday, April 22, 2025 4:01 PM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <z Golkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Thank you, Mandy. I have received your email, and our Council has received the letter sent to Cathy Chavers. We will review and advise any concerns. Have a wonderful week.

Kind regards,
Amy Mason
Energy Director
Bois Forte Tribal Government
5344 Lakeshore Drive
Nett Lake, MN 55772
Main Line: (218) 757-3261 x1204
Cell: (218) 404-9989

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 3:54 PM
To: Amy Mason <amy.mason@boisforte-nsn.gov>
Cc: Zach Golkowski (MP) <z Golkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

Amy Mason:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or z Golkowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental

Minnesota Power/ALLETE, Inc.

Mandy Bohnenblust

612.746.3677 direct

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mandy.bohnenblust@merjent.com



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April 18, 2025

VIA Email

Amy Mason
Bois Forte Band of Chippewa
amy.mason@boisforte-nsn.gov

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Amy Mason:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

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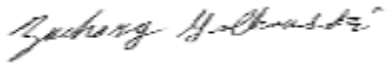
April 18, 2025

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Cultural Resources Survey: The Applicants have contracted Merjent, Inc. to complete a Phase Ia Literature Review and a Phase I Archaeological Reconnaissance Survey.

I respectfully request your assistance with the identification of information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

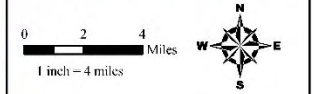
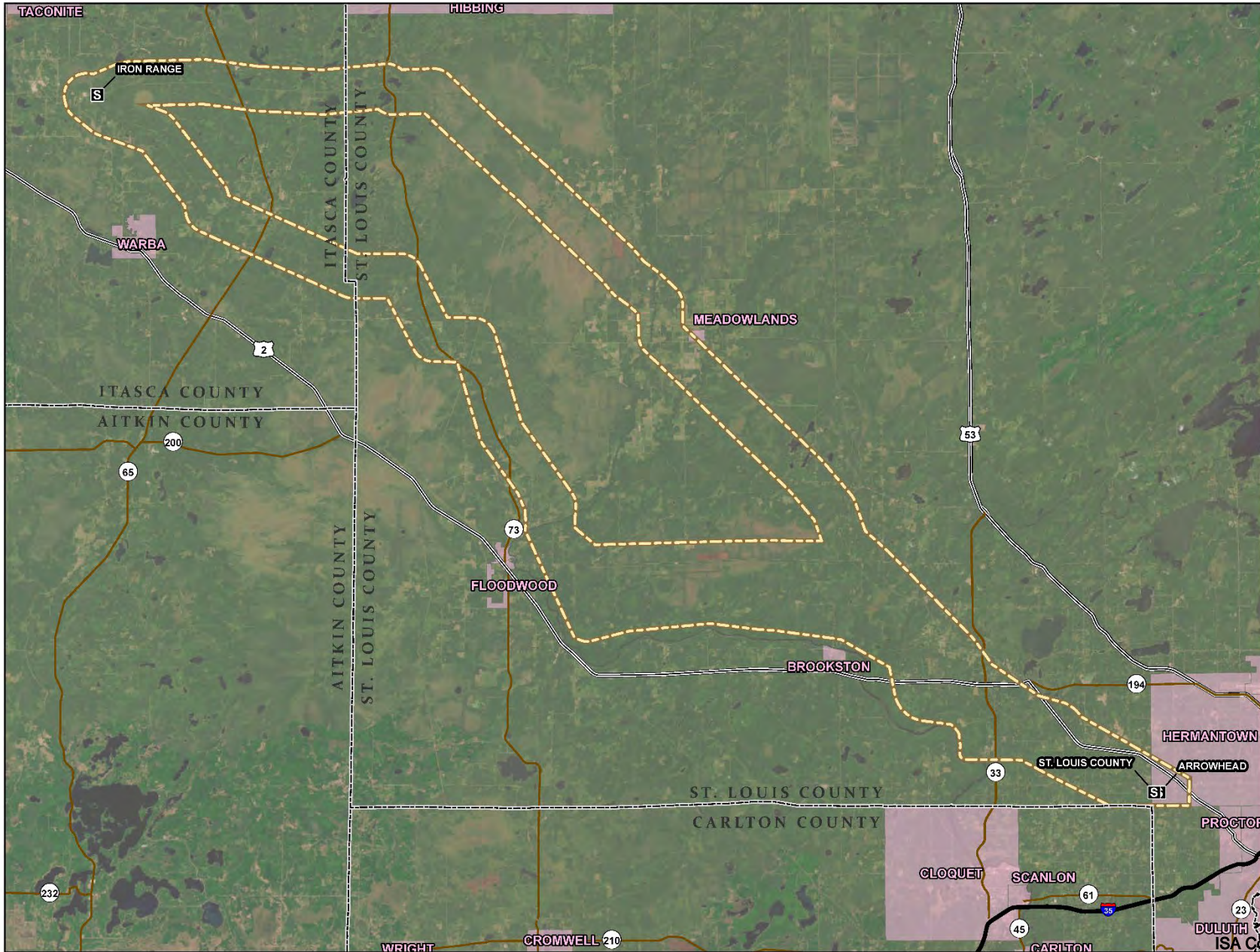
Sincerely,



Zachary Gorkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

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Appendix O

Page 15 of 44

From: [Zach Golkowski \(MP\)](#)
To: [Bill Rudnicki \(TO\)](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#)
Subject: Re: [EXTERNAL MAIL] Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Wednesday, May 7, 2025 10:17:06 AM
Attachments: [image001.png](#)
[image002.png](#)

Hi Bill,

I apologize for the delayed response.

Thank you for your response; we look forward to working with interested tribal nations on this project.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Bill Rudnicki (TO) <bill.rudnicki@shakopeedakota.org>
Sent: Sunday, April 20, 2025 6:04 PM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: [EXTERNAL MAIL] Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Thanks for information, I will forward internally within our tribal nation.

Generally, we will allow the northern tribal nations to comment on these types of project requests.



BILL RUDNICKI
Tribal Administrator • Tribal Administration
Shakopee Mdewakanton Sioux Community
d: 952.496.6145
ShakopeeDakota.org
bill.rudnicki@shakopeedakota.org

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Date: Friday, April 18, 2025 at 6:19 PM
To: Bill Rudnicki <bill.rudnicki@shakopeedakota.org>
Cc: "Zach Golkowski (MP)" <zgolkowski@mnpower.com>, Dan Flo <dan.flo@merjent.com>, Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Bill Rudnicki:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

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Regards,

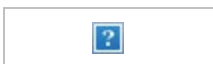
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power/ALLETE, Inc.

Mandy Bohnenblust

612.746.3677 direct

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Minneapolis, MN 55414

612.746.3660 main

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866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Bill Rudnicki
Shakopee Mdewakanton Sioux Community
bill.rudnicki@shakopeedakota.org

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Bill Rudnicki:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission’s approval process.

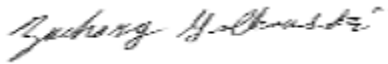
April 18, 2025

Page 2

Cultural Resources Survey: The Applicants have contracted Merjent, Inc. to complete a Phase Ia Literature Review and a Phase I Archaeological Reconnaissance Survey.

I respectfully request your assistance with the identification of information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgoldkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

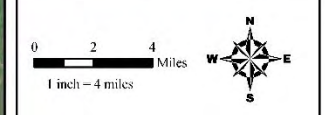
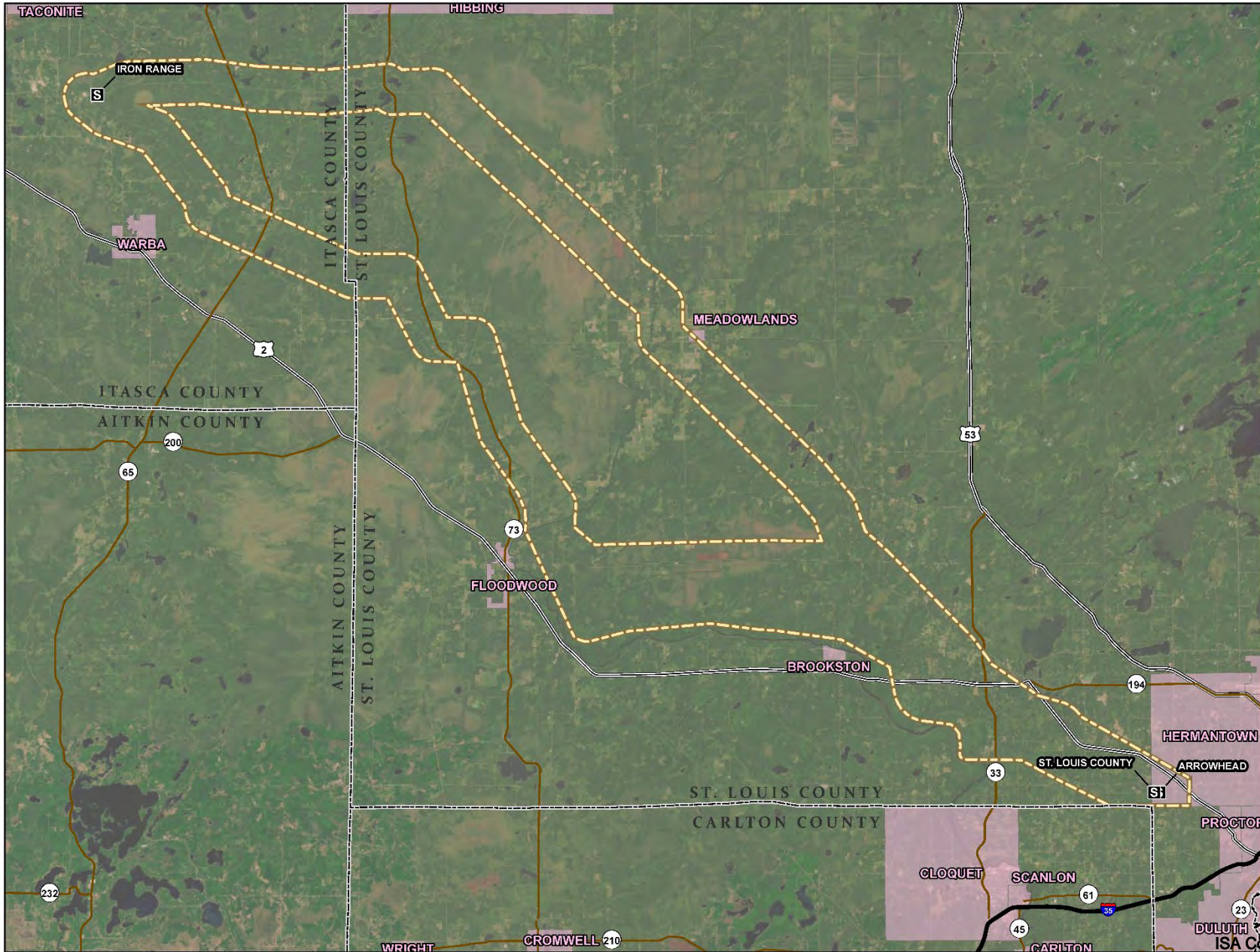
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix O

Page 21 of 44

From: [Zach Golkowski \(MP\)](#)
To: [Leonard Wabasha \(TO\)](#); [Mandy Bohnenblust](#); [jrbathel7@yahoo.com](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#)
Subject: Re: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Wednesday, May 7, 2025 10:22:20 AM
Attachments: [image002.png](#)
[image003.png](#)

Hi Leonard,

I apologize for the delayed response here.

Thank you for the request. We'd be happy to provide the results of the Phase I Literature Review, of the proposed route, when it's available. In addition, we'll be sure to include Joe in all future correspondence.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Leonard Wabasha (TO) <leonard.wabasha@shakopeedakota.org>
Sent: Monday, April 21, 2025 6:44 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; jrbathel7@yahoo.com
<Jrbathel7@yahoo.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

You don't often get email from leonard.wabasha@shakopeedakota.org. [Learn why this is important](#)

Freeze!

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Please send results of the phase 1 literature study of proposed route(s) when available, and please include Joe Bathel in all future correspondence. Thanks and Have a Great Day!!



LEONARD WABASHA
Tribal Historic Preservation Officer • Hokokata Ti
Shakopee Mdewakanton Sioux Community
d: 952.496.6120
shakopeedakota.org
Leonard.Wabasha@shakopeedakota.org

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 7:24 PM
To: Leonard Wabasha (TO) <leonard.wabasha@shakopeedakota.org>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Leonard Wabasha:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power/ALLETE, Inc.

Mandy Bohnenblust

612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



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April 18, 2025

VIA Email

Leonard Wabasha
Shakopee Mdewakanton Sioux Community
Tribal Historic Preservation Officer
leonard.wabasha@shakopeedakota.org

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

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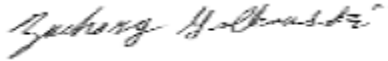
The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

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I respectfully request your assistance with the identification of information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

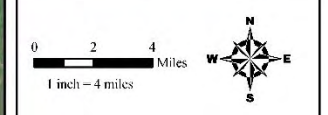
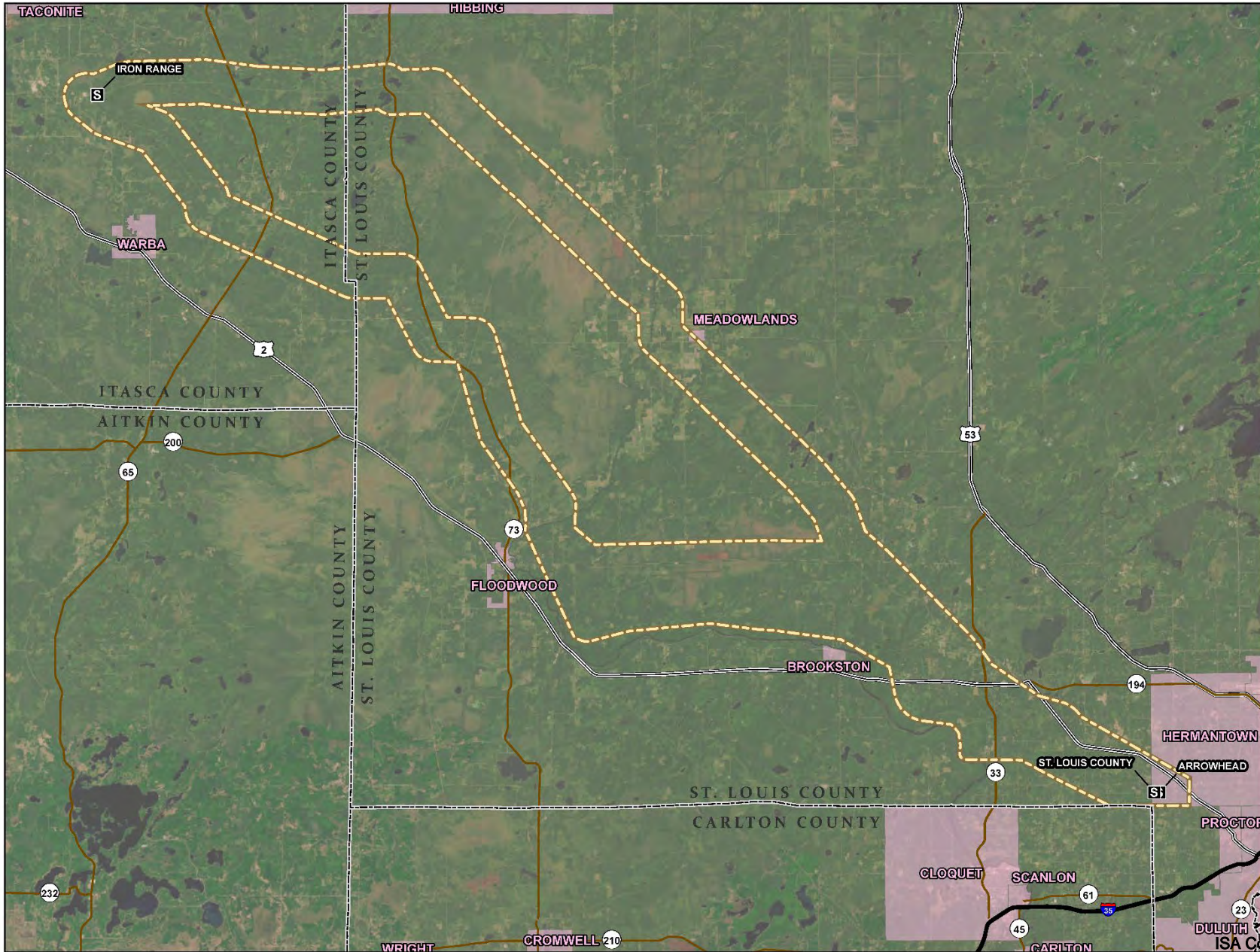
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix O

Page 27 of 44

From: [Zach Golkowski \(MP\)](#)
To: [Evan J Schroeder](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#); [Arianna V Northbird Himango](#); [Thomas E Howes](#)
Subject: RE: [EXTERNAL MAIL] Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Monday, May 19, 2025 2:38:29 PM
Attachments: [image002.png](#)
[image003.png](#)
[ISA_Study_Area_20250513.zip](#)

Hi Evan,

Thank you for responding to the ISA Project introduction letter. Attached is a shapefile of the Study Area in NAD 1983, UTM Zone 15, for your use. The ISA Project is in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We are currently requesting feedback from local, state, and federal agencies and tribal representatives regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public. At this time, the Project does not anticipate any federal approvals that would lead to project-wide evaluation under Section 106 of the National Historic Preservation Act.

We have not completed any cultural resource or historic property identification to-date, but will complete a Literature Review of the Route Corridor, once it's been identified. We would be happy to provide those results, upon completion of the review, to facilitate feedback from the Fond du Lac Tribal Historic Preservation Office. We look forward to your continued input on this Project.

I'd be more than happy to set up a meeting in the near future to walk you through what we know at this point or to answer any questions that you have. Please let me know and we can set aside some time.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802


O: 218-355-3366

C: 218-428-5582

From: Evan J Schroeder <EvanSchroeder@FDLBand.org>
Sent: Tuesday, May 13, 2025 4:20 PM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Arianna V Northbird Himango
<AriannaNorthbirdHimango@FDLBand.org>; Thomas E Howes <thomashowes@FDLBand.org>

Subject: [EXTERNAL MAIL] Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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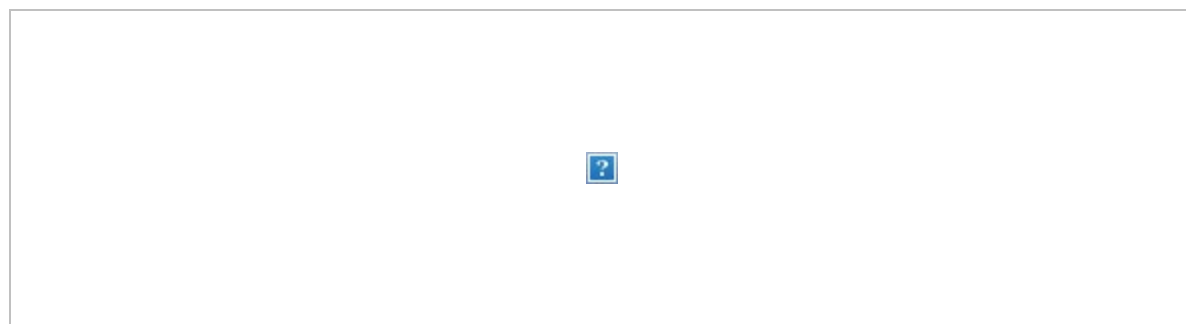
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Good afternoon, Mandy,

The Fond du Lac Tribal Historic Preservation Office is interested in consulting on this project. Could you please provide shapefiles in NAD 1983 UTM Zone 15 projection? Given the project's proximity to the Fond du Lac Reservation, we'd also appreciate any information resulting from historic property identification efforts conducted to date.

I look forward to connecting further with you and your team.

All the best,
Evan



From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 6:53 PM
To: Evan J Schroeder <EvanSchroeder@FDLBand.org>
Cc: Zach Golkowski (MP) <zgoldkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Evan Schroeder:

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Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power/ALLETE, Inc.

Mandy Bohnenblust
612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



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April 18, 2025

VIA Email

Evan Schroeder
Fond du Lac Band of Lake Superior Chippewa
Tribal Historic Preservation Officer
evanschroeder@fdlrez.com

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

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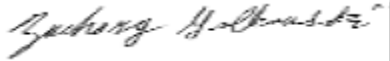
April 18, 2025

Page 2

Cultural Resources Survey: The Applicants have contracted Merjent, Inc. to complete a Phase Ia Literature Review and a Phase I Archaeological Reconnaissance Survey.

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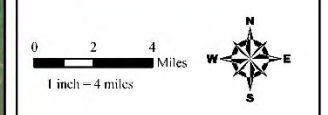
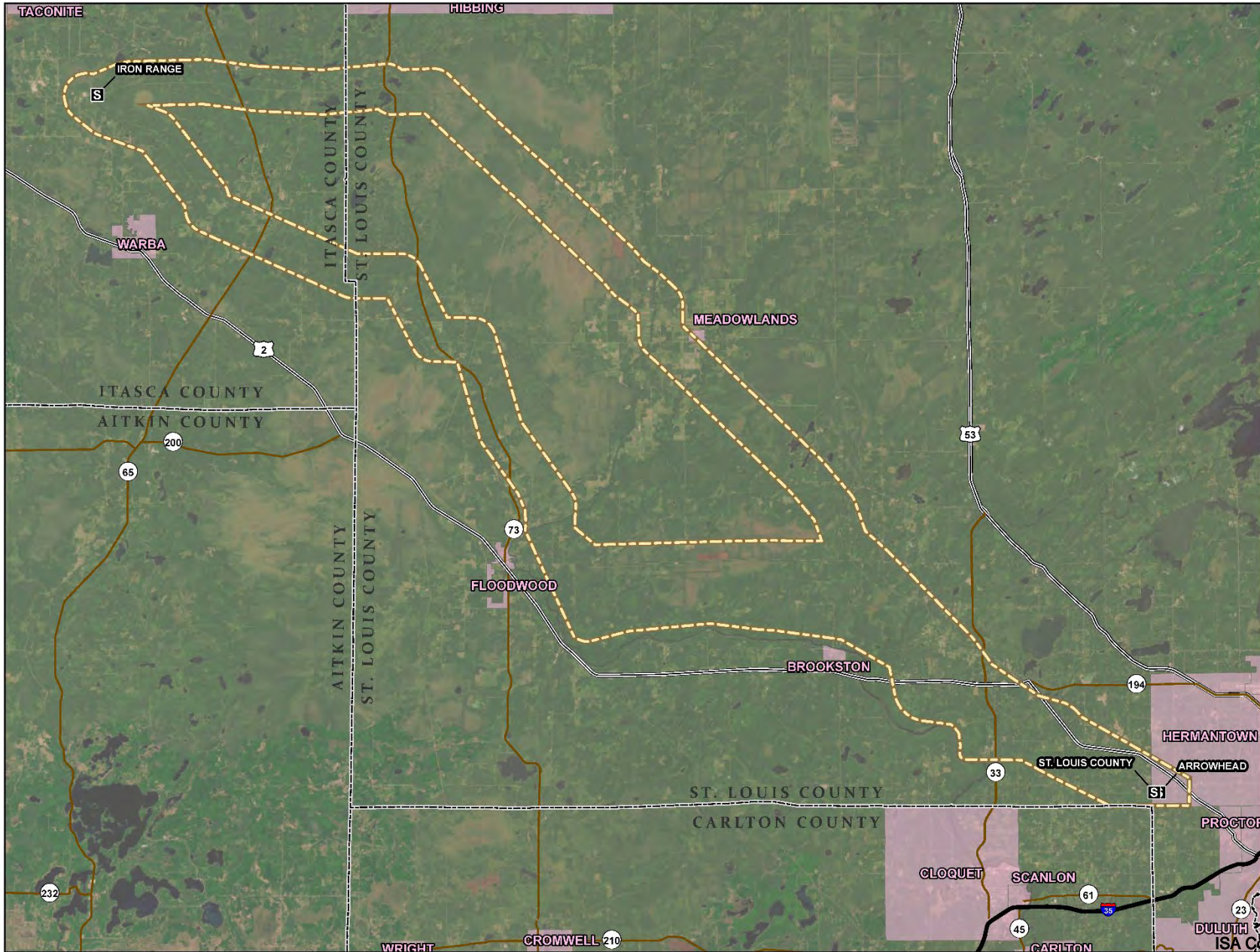
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

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- S** Substation
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ISA Project
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 Project Overview

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Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix O

Page 34 of 44

From: [Zach Golkowski \(MP\)](#)
To: [Evan J Schroeder](#); [Drew Janke \(MP\)](#)
Cc: [Mandy Bohnenblust](#); [Marissa Honeycutt](#); [Jo Render](#)
Subject: EXTERNAL: ISA - Cultural Resources Literature Report
Date: Tuesday, September 2, 2025 10:15:11 AM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of Merjent.

Dear Evan Shroeder,

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The Phase Ia literature review report provides additional information on the Project and a review of the cultural resources within 1-mile of the Project that are on file with the State Historic Preservation Office and the Office of the State Archaeologist. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please find the ISA Phase Ia literature review here: [ISA Cultural Resources](#).

Please contact Drew Janke at 218-355-3569 or djanke@mnpower.com should you need additional information.

Drew Janke will be the new Minnesota Power lead on this project, as I have accepted another position at a different company. Drew will be transitioning to the ISA project and will be the contact moving forward. It has been great working with you thus far and I greatly appreciate the collaboration we have had on this project as well as past projects with Minnesota Power!

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: [Zach Golkowski \(MP\)](#)
To: [Leonard Wabasha \(TO\)](#); [Drew Janke \(MP\)](#)
Cc: [Mandy Bohnenblust](#); [Jo Render](#); [Marissa Honeycutt](#)
Subject: EXTERNAL: ISA - Cultural Resources Literature Report
Date: Tuesday, September 2, 2025 10:21:44 AM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of Merjent.

Dear Leonard Wabasha,

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Thank you,

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Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

**Minnesota Power
Iron Range – St. Louis County - Arrowhead Transmission Project
Record of Conversation Template**

Date of contact: <i>Month Day, Year @ Time</i>	December 9, 2025 @ 14:35
Minnesota Power Staff Present: <i>Name(s) and role(s)</i>	Drew Janke – Permitting Lead
Type of contact: <i>In-person meeting/virtual meeting/phone call; Location if in person</i>	Phone Call
Name(s) of individual(s) or group(s): <i>Name, organization, role, and contact information for each individual/group outside of Minnesota Power</i>	Rob Hull Tribal Historic Preservation Officer – Grand Portage Band of Ojibwe 218-475-0111 thpo@grandportage.com
Brief description of topics discussed, including any decision points, action items, or follow-up needed	Drew left a voicemail with Rob explaining that he was following up on the previous Project introduction and outreach letters (Intro Letter on 4/18/25; Pre-application Coordination Letter on 9/19/2025; Open House Invite Letters on 5/6/2025 & 7/21/2025) and that if Rob or his group have any questions, concerns or interest in the Project to please call Drew back at 218-355-3569.
Follow-up assigned to:	N/A

**Minnesota Power
Iron Range – St. Louis County - Arrowhead Transmission Project
Record of Conversation Template**

Date of contact: <i>Month Day, Year @ Time</i>	December 9, 2025 @ 14:40
Minnesota Power Staff Present: <i>Name(s) and role(s)</i>	Drew Janke – Permitting Lead
Type of contact: <i>In-person meeting/virtual meeting/phone call; Location if in person</i>	Phone Call
Name(s) of individual(s) or group(s): <i>Name, organization, role, and contact information for each individual/group outside of Minnesota Power</i>	Gina Lemon Tribal Historic Preservation Officer – Leech Lake Band of Ojibwe 218-335-2940 Gina.lemon@llojibwe.net
Brief description of topics discussed, including any decision points, action items, or follow-up needed	Drew left a voicemail with Gina explaining that he was following up on the previous Project introduction and outreach letters (Intro Letter on 4/18/25; Pre-application Coordination Letter on 9/19/2025; Open House Invite Letters on 5/6/2025 & 7/21/2025) and that if Gina or her group have any questions, concerns or interest in the Project to please call Drew back at 218-355-3569.
Follow-up assigned to:	N/A

**Minnesota Power
Iron Range – St. Louis County - Arrowhead Transmission Project
Record of Conversation Template**

Date of contact: <i>Month Day, Year @ Time</i>	December 9, 2025 @ 14:45
Minnesota Power Staff Present: <i>Name(s) and role(s)</i>	Drew Janke – Permitting Lead
Type of contact: <i>In-person meeting/virtual meeting/phone call; Location if in person</i>	Phone Call
Name(s) of individual(s) or group(s): <i>Name, organization, role, and contact information for each individual/group outside of Minnesota Power</i>	Cheyenne St. John Tribal Historic Preservation Officer – Lower Sioux Indian Community 507-697-8672 Cheyenne.stjohn@lowersioux.com
Brief description of topics discussed, including any decision points, action items, or follow-up needed	Drew called Cheyenne at 507-697-8672 but was unable to get through to a voicemail system.
Follow-up assigned to:	N/A

**Minnesota Power
Iron Range – St. Louis County - Arrowhead Transmission Project
Record of Conversation Template**

Date of contact: <i>Month Day, Year @ Time</i>	December 10, 2025 @ 09:05
Minnesota Power Staff Present: <i>Name(s) and role(s)</i>	Drew Janke – Permitting Lead
Type of contact: <i>In-person meeting/virtual meeting/phone call; Location if in person</i>	Phone Call
Name(s) of individual(s) or group(s): <i>Name, organization, role, and contact information for each individual/group outside of Minnesota Power</i>	Mike Wilson Tribal Historic Preservation Officer – Mille Lacs Band of Ojibwe 320-532-7780 mike.wilson@millelacsband.com
Brief description of topics discussed, including any decision points, action items, or follow-up needed	Drew left a voicemail with Mike explaining that he was following up on the previous Project introduction and outreach letters (Intro Letter on 4/18/25; Pre-application Coordination Letter on 9/19/2025; Open House Invite Letters on 5/6/2025 & 7/21/2025) and that if Mike or his group have any questions, concerns or interest in the Project to please call Drew back at 218-355-3569.
Follow-up assigned to:	N/A

**Minnesota Power
Iron Range – St. Louis County - Arrowhead Transmission Project
Record of Conversation Template**

Date of contact: <i>Month Day, Year @ Time</i>	December 10, 2025 @ 09:10
Minnesota Power Staff Present: <i>Name(s) and role(s)</i>	Drew Janke – Permitting Lead
Type of contact: <i>In-person meeting/virtual meeting/phone call; Location if in person</i>	Phone Call
Name(s) of individual(s) or group(s): <i>Name, organization, role, and contact information for each individual/group outside of Minnesota Power</i>	Noah White Tribal Historic Preservation Officer – Prairie Island Indian Community 651-385-4175 Noah.white@piic.org
Brief description of topics discussed, including any decision points, action items, or follow-up needed	Drew left a voicemail with Noah explaining that he was following up on the previous Project introduction and outreach letters (Intro Letter on 4/18/25; Pre-application Coordination Letter on 9/19/2025; Open House Invite Letters on 5/6/2025 & 7/21/2025) and that if Noah or his group have any questions, concerns or interest in the Project to please call Drew back at 218-355-3569.
Follow-up assigned to:	N/A

**Minnesota Power
Iron Range – St. Louis County - Arrowhead Transmission Project
Record of Conversation Template**

Date of contact: <i>Month Day, Year @ Time</i>	December 10, 2025 @ 09:15
Minnesota Power Staff Present: <i>Name(s) and role(s)</i>	Drew Janke – Permitting Lead
Type of contact: <i>In-person meeting/virtual meeting/phone call; Location if in person</i>	Phone Call
Name(s) of individual(s) or group(s): <i>Name, organization, role, and contact information for each individual/group outside of Minnesota Power</i>	George Branchaude Tribal Historic Preservation Officer – Red Lake Nation 218-679-1687 George_branchaude@redlakenation.org
Brief description of topics discussed, including any decision points, action items, or follow-up needed	Drew left a voicemail with George explaining that he was following up on the previous Project introduction and outreach letters (Intro Letter on 4/18/25; Pre-application Coordination Letter on 9/19/2025; Open House Invite Letters on 5/6/2025 & 7/21/2025) and that if George or his group have any questions, concerns or interest in the Project to please call Drew back at 218-355-3569.
Follow-up assigned to:	N/A

**Minnesota Power
Iron Range – St. Louis County - Arrowhead Transmission Project
Record of Conversation Template**

Date of contact: <i>Month Day, Year @ Time</i>	December 10, 2025 @ 09:17
Minnesota Power Staff Present: <i>Name(s) and role(s)</i>	Drew Janke – Permitting Lead
Type of contact: <i>In-person meeting/virtual meeting/phone call; Location if in person</i>	Phone Call
Name(s) of individual(s) or group(s): <i>Name, organization, role, and contact information for each individual/group outside of Minnesota Power</i>	Samantha Odegard Tribal Historic Preservation Officer – Upper Sioux Community 320-564-6334 samanthao@uppersiouxcommunity-nsn.gov
Brief description of topics discussed, including any decision points, action items, or follow-up needed	Drew left a voicemail with Samantha explaining that he was following up on the previous Project introduction and outreach letters (Intro Letter on 4/18/25; Pre-application Coordination Letter on 9/19/2025; Open House Invite Letters on 5/6/2025 & 7/21/2025) and that if Samantha or her group have any questions, concerns or interest in the Project to please call Drew back at 218-355-3569.
Follow-up assigned to:	N/A

**Minnesota Power
Iron Range – St. Louis County - Arrowhead Transmission Project
Record of Conversation Template**

Date of contact: <i>Month Day, Year @ Time</i>	December 10, 2025 @ 09:20
Minnesota Power Staff Present: <i>Name(s) and role(s)</i>	Drew Janke – Permitting Lead
Type of contact: <i>In-person meeting/virtual meeting/phone call; Location if in person</i>	Phone Call
Name(s) of individual(s) or group(s): <i>Name, organization, role, and contact information for each individual/group outside of Minnesota Power</i>	Jacob Syverson Tribal Historic Preservation Officer – White Earth Nation 218-935-3503 Jacob.syverson@whiteearth-nsn.gov
Brief description of topics discussed, including any decision points, action items, or follow-up needed	Drew left a voicemail with Jacob explaining that he was following up on the previous Project introduction and outreach letters (Intro Letter on 4/18/25; Pre-application Coordination Letter on 9/19/2025; Open House Invite Letters on 5/6/2025 & 7/21/2025) and that if Jacob or his group have any questions, concerns or interest in the Project to please call Drew back at 218-355-3569.
Follow-up assigned to:	N/A

APPENDIX P
IRON RANGE – ST. LOUIS COUNTY – ARROWHEAD 345 KV
TRANSMISSION LINE PROJECT
AGENCY COORDINATION AND COMMENTS

INDEX

4/18/2025 Project Introduction Letter to Agencies with distribution lists

Agency Responses to Project Introduction Letter

- 4/22/2025 Email, A. Gronhovd, Office of the State Archaeologist
- 4/23/2025 Email, A. Marrier, Minnesota Department of Natural Resources, Division of Lands and Minerals
- 4/23/2025 Email, A. Wilson, FAA Obstruction Evaluation Group
- 4/23/2025 Email, M. Duchatellier, FAA Obstruction Evaluation Group
- 4/23/2025 Email, S. Kotch Egstad, Minnesota Department of Transportation
- 4/24/2025 Email, A. Harala, St. Louis County
- 4/24/2025 Email, G. Wilson, Minnesota Department of Natural Resources
- 4/24/2025 Email, N. Budde, Minnesota Department of Health
- 4/24/2025 Email, R. Tawes, U.S. Fish and Wildlife Service
- 5/1/2025 Email, D. Luzinski, Minnesota Department of Health, Source Water Protection Unit
- 5/1/2025 Email, J. Drake, Minnesota Department of Natural Resources
- 5/2/2025 Email, J. Parson, Minnesota Department of Natural Resources
- 5/7/2025 Email, C. Christopherson, Minnesota Department of Commerce, TACE
- 5/7/2025 Email, G. Goggeye Jr., Minnesota Indian Affairs Council
- 5/7/2025 Email, G. Rutherford, Trout Lake Township
- 5/7/2025 Email, M. Emanuel, U.S. Fish and Wildlife Service
- 5/9/2025 Conversation Record, J. Kinney, U.S. Army Corps of Engineers
- 9/23/2025 Email, I. Weston, Minnesota Indian Affairs Council
- 10/6/2025 Email, L. Harrington, State Historic Preservation Office
- 10/14/2025 Email, P. Bernsdorf, Elmer Township
- 11/20/2025 Email, J. Parson, Minnesota Department of Natural Resources
- 11/24/2025, Email, S. Kotch Egstad, Minnesota Department of Transportation
- 11/26/2025 Email, S. Roos, Minnesota Department of Agriculture
- 12/11/2025 Email, A. Means, Minnesota Department of Natural Resources

Formal Comment Letters from Agencies

- 4/28/2025 Letter, D. Luzinski, Minnesota Department of Health, Source Water Protection Unit
- 6/4/2025 Letter, R. Tawes, U.S. Fish and Wildlife Service
- 6/6/2025 Letter, K. Gragg Johnson, State Historic Preservation Office

- 6/25/2025 Letter, J. Parson, Minnesota Department of Natural Resources
- 10/5/2025 Letter, A. Spong, State Historic Preservation Office

Project Update Memos

- 7/22/2025 Memo, J. Gottschald, St. Louis County
- 10/7/2025, Memo, J. Gottschald, St. Louis County

General Federal and State Agency Distribution List

Agency	Name	Title	Address	Email
Federal Aviation Administration	Marla Duchatellier	Air Traffic Technician	6020 28th Ave S, Ste. 201 Minneapolis, MN 55450	Marla.Duchatellier@faa.gov
Federal Aviation Administration	Ashley Wilson	Air Traffic Specialist	6020 28th Ave S, Ste. 201 Minneapolis, MN 55450	ashley.m.wilson@faa.gov
U.S. Army Corps of Engineers	To Whom it May Concern		332 Minnesota St, Ste. E1500 St. Paul, MN 55101	USACE_Requests_MN@usace.army.mil
U.S. Department of Agriculture	Candi Fuller	District Conservationist	1889 E Hwy 2 Grand Rapids, MN 55744	candi.fuller@usda.gov
U.S. Department of Agriculture	Allison Praet	District Conservationist	4850 Miller Trunk Hwy Duluth, MN 55811	allison.praet@usda.gov
Minnesota Department of Agriculture	Stephan Roos	Planner	625 Robert St N St. Paul, MN 55155	stephan.roos@state.mn.us
Minnesota Department of Health	Christopher Parthun	Principal Planner	P.O. Box 64975 St. Paul, MN 55164	chris.parthun@state.mn.us
Minnesota Department of Health	Nick Budde	Hydrologist	P.O. Box 64975 St. Paul, MN 55164	nicholas.budde@state.mn.us
Minnesota Department of Health	Dereck Richter	Principal Planner	P.O. Box 64975 St. Paul, MN 55164	dereck.richter@state.mn.us
Minnesota Department of Health	Danielle Luzinski	Statewide Surface Water Hydrologist	P.O. Box 64975 St. Paul, MN 55164	danielle.luzinski@state.mn.us
Minnesota Department of Transportation	Joe Pignato	Land Management Office Director	395 John Ireland Blvd Mailstop 630 St. Paul, MN 55155	joseph.pignato@state.mn.us
Minnesota Department of Transportation	Stacy Kotch Egstad	Utility Routing and Siting Coordinator	395 John Ireland Blvd Mailstop 630 St. Paul, MN 55155	stacy.kotch@state.mn.us
Minnesota Department of Transportation	Matt Meyer	Hydrologist	1123 Mesaba Ave Duluth, MN 55811	matthew.m.meyer@state.mn.us
Minnesota Department of Transportation	Tom Lee	Hydrologist	1123 Mesaba Ave Duluth, MN 55811	thomas.lee@state.mn.us
Minnesota Department of Transportation	Shane Gries	Right of Way Permits	1123 Mesaba Ave Duluth, MN 55811	shane.gries@state.mn.us
Minnesota Indian Affairs Council	Shannon Geshick	Executive Director	161 St. Anthony Ave, Ste. 919 St. Paul, MN 55103	shannon.geshick@state.mn.us
Minnesota Indian Affairs Council	George Goggleye Jr.	Cultural Resources Manager	161 St. Anthony Ave, Ste. 919 St. Paul, MN 55103	george.goggleye@state.mn.us
Minnesota Indian Affairs Council	Lilly Geraghty	Cultural Resources Manager	161 St. Anthony Ave, Ste. 919 St. Paul, MN 55103	lilly.geraghty@state.mn.us

General Federal and State Agency Distribution List

Agency	Name	Title	Address	Email
Minnesota Indian Affairs Council	Isaac Weston	Cultural Resources Manager	161 St. Anthony Ave, Ste. 919 St. Paul, MN 55103	isaac.weston@state.mn.us
Minnesota Pollution Control Agency	Jim Dexter	Environmental Review Specialist	520 Lafayette Rd, Box 25 St. Paul, MN 55155	James.Dexter@state.mn.us
Minnesota Pollution Control Agency	Kirsten Barta	Regional General Permits	520 Lafayette Rd, Box 25 St. Paul, MN 55155	kirsten.barta@state.mn.us
Minnesota State Historic Preservation Office	Leslie Coburn	Manager, Environmental Review Specialist	50 Sherburne Ave, Suite 203 St. Paul, MN 55155	leslie.coburn@state.mn.us
Minnesota State Historic Preservation Office	Kelly Gragg-Johnson	Environmental Review Specialist	50 Sherburne Ave, Suite 203 St. Paul, MN 55155	kelly.graggjohnson@state.mn.us
Office of the State Archaeologist	Amanda Gronhovd	MN State Archaeologist	328 W Kellogg Blvd St. Paul, MN 55102	Amanda.Gronhovd@state.mn.us
Public Utilities Commission	Bret Eknes	Supervisor	121 7th Place E, Suite 350 St. Paul, MN 55101	Bret.Eknes@state.mn.us
Minnesota Board of Soil and Water Resources	Ryan Hughes	Manager	525 S Lake Ave, #400 Duluth, MN 55802	ryan.hughes@state.mn.us
Minnesota Board of Soil and Water Resources	Matt Johnson	Wetland Specialist	2532 Hannah Ave NW Bemidji, MN 56601	matthew.johnson@state.mn.us
Minnesota Board of Soil and Water Resources	Waylon Glienke	Wetland Specialist	1889 E Hwy 2 Grand Rapids, MN 55744	waylon.glienke@itascaswcd.org
Minnesota Board of Soil and Water Resources	Dave Demmer	Wetland Specialist	525 S Lake Ave, #400 Duluth, MN 55802	david.demmer@state.mn.us
Minnesota Board of Soil and Water Resources	Mark Lindhorst	Wetland Specialist	100 N 5th Ave W Duluth, MN 55802	lindhorstm@stlouiscountymn.gov



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866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Name
Agency
Address
Address
Email address

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Name:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that

April 18, 2025

Page 2

will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission's approval process.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

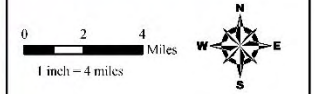
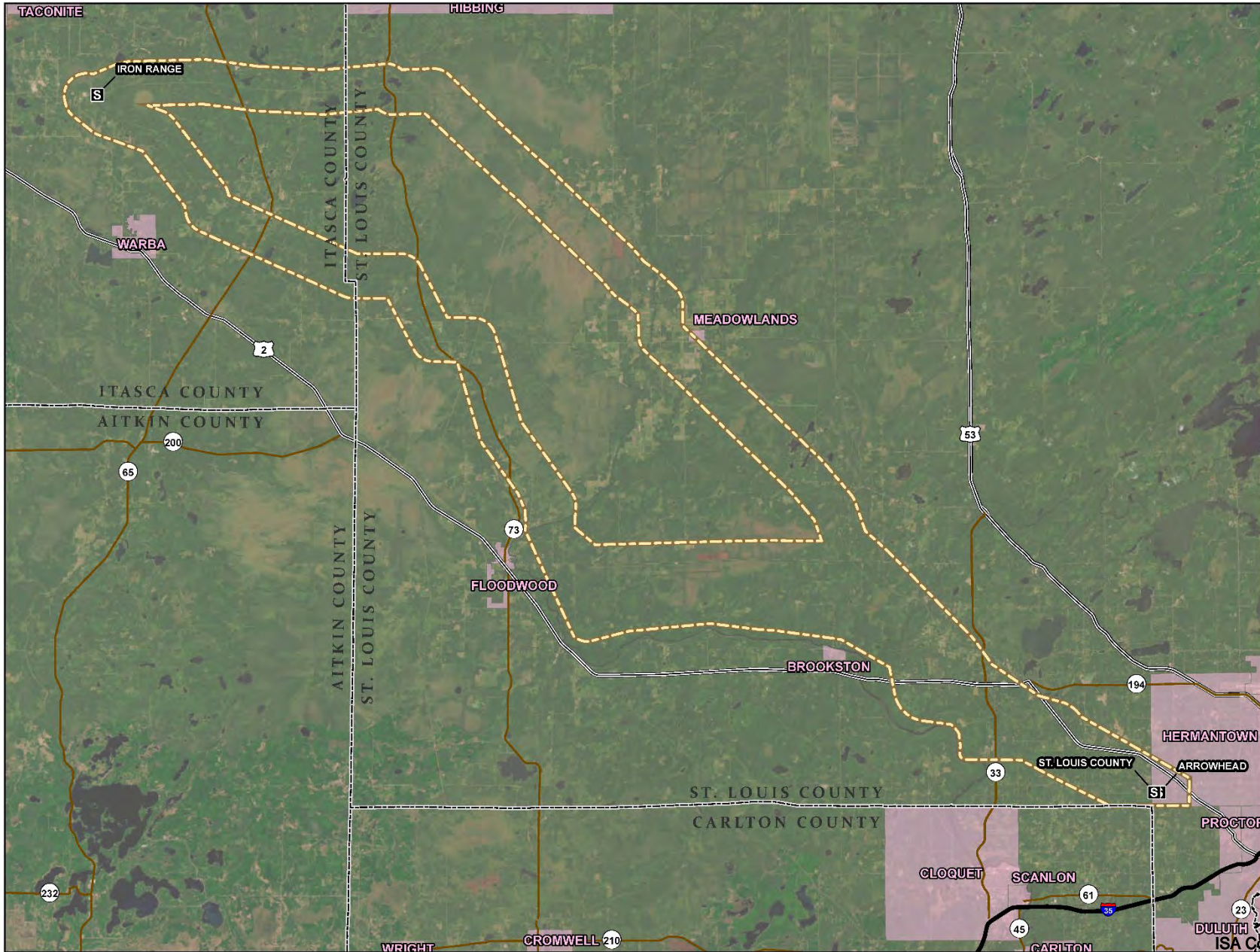
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 9 of 248

Minnesota Department of Natural Resources Distribution List

Agency	Name	Title	Address	Email
Minnesota Department of Natural Resources	Shelly Patten	Regional Director	1201 E Hwy 2 Grand Rapids, MN 55744	Shelly.patten@state.mn.us
Minnesota Department of Natural Resources	Grant Wilson	Regional Director	1200 Warner Rd St. Paul, MN 55106	Grant.wilson@state.mn.us
Minnesota Department of Natural Resources	Kate Fairman	Environmental Review Operations Lead	500 Lafayette Rd St. Paul, MN 55155	kate.fairman@state.mn.us
Minnesota Department of Natural Resources	Becky Horton	EIS Project Manager	500 Lafayette Rd St. Paul, MN 55155	becky.horton@state.mn.us
Minnesota Department of Natural Resources	Diane Johnson	Realty Specialist, Utility License Crossing	2115 Birchmont Beach Rd, NE Bemidji, MN 56601	diane.johnson@state.mn.us
Minnesota Department of Natural Resources	Jessica Parson	NE Region Ecologist	1201 E Hwy 2 Grand Rapids, MN 55744	jessica.parson@state.mn.us
Minnesota Department of Natural Resources	Patty Thielen	NE Region Director	1601 Minnesota Dr Brainerd, MN 56401	patty.thielen@state.mn.us
Minnesota Department of Natural Resources	Brianna Speldrich	Hydrologist	525 Lake Ave. S, Suite 415 Duluth, MN 55802	Brianna.Speldrich@state.mn.us
Minnesota Department of Natural Resources	Molly Barrett	Natural Heritage Review Specialist	500 Lafayette Rd St. Paul, MN 55155	Molly.Barrett@state.mn.us
Minnesota Department of Natural Resources	Jim Drake	Natural Heritage Review Specialist	500 Lafayette Rd St. Paul, MN 55155	jim.drake@state.mn.us
Minnesota Department of Natural Resources	Chuck Carpenter	Northeast Regional Manager	1201 E Hwy 2 Grand Rapids, MN 55744	Charles.Carpenter@state.mn.us



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866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Name
Minnesota Department of Natural Resources
Address
Address
Email address

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Name:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. We appreciate your assistance as we evaluate siting and routing information and work through the Commission’s approval process.

April 18, 2025

Page 2

On behalf of the Applicants, Merjent will submit a formal Natural Heritage Review Request through the Minnesota Department of Natural Resources' ("DNR") Minnesota Conservation Explorer ("MCE"). The Applicants look forward to working with the DNR to avoid and minimize impacts to state-protected species.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgoldowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

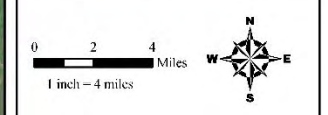
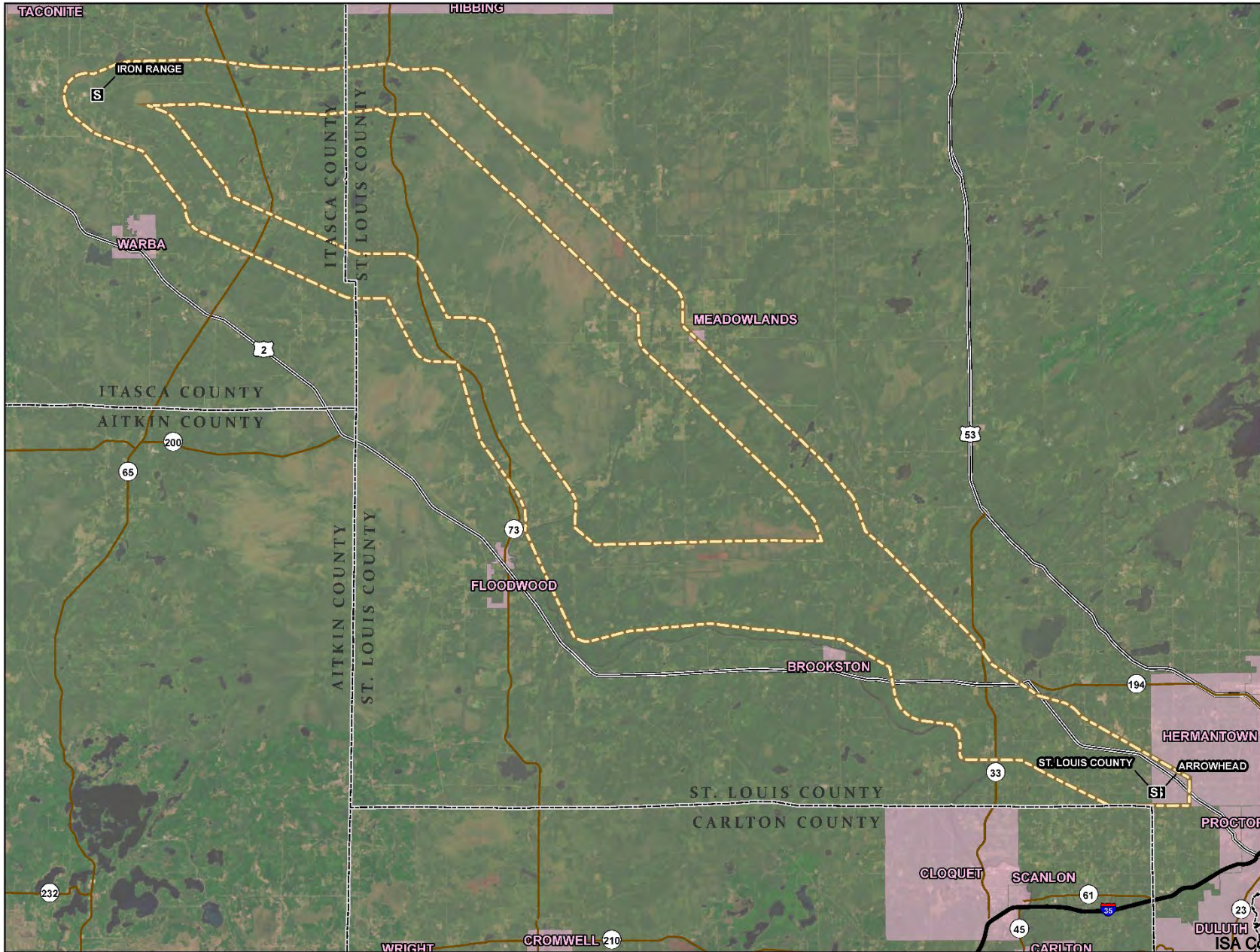
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Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

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ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 13 of 248

U. S. Fish and Wildlife Service Distribution List

Agency	Name	Title	Address	Email
U.S. Fish and Wildlife Service	Robert Tawes	Field Supervisor	3815 American Blvd E Bloomington, MN 55425	robert_tawes@fws.gov
U.S. Fish and Wildlife Service	To Whom it May Concern		3815 American Blvd E Bloomington, MN 55425	permitsr3mb@fws.gov



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April 18, 2025

VIA Email

Name
U.S. Fish and Wildlife Service
Address
Address
Email address

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

To Whom it May Concern:

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April 18, 2025

Page 2

The Applicants will review the Project using the United States Fish and Wildlife Service's ("USFWS") Information for Planning and Consultation ("IPaC") tool and will evaluate the Project using Determination Keys ("D-Keys") available at the time. In the event that the available D-Keys are not applicable to the Project, the Applicants will coordinate with the USFWS Twin Cities Field Office.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

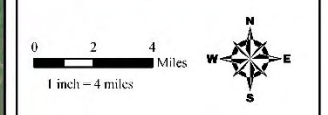
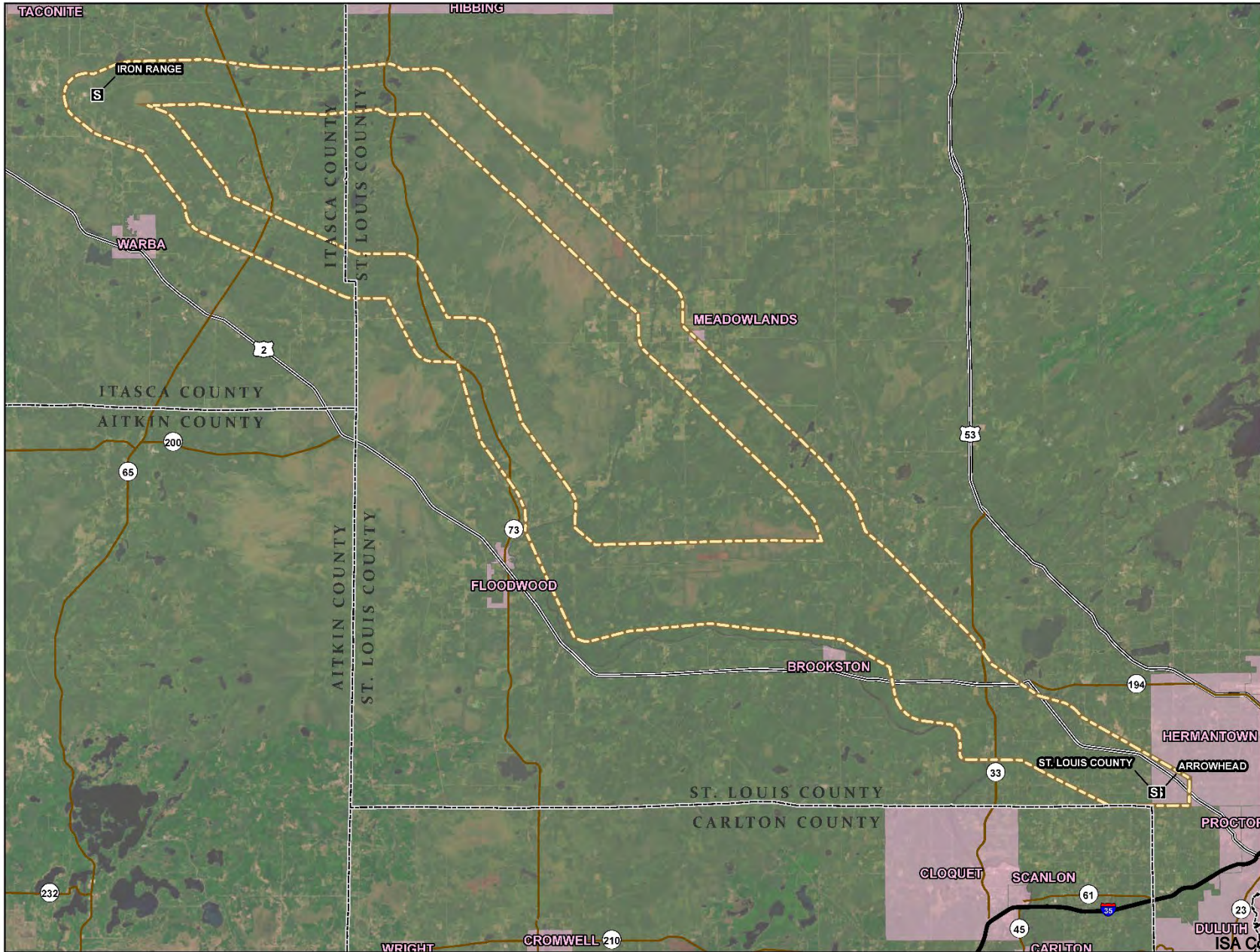
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 17 of 248

Local Government Distribution List

Agency	Name	Title	Address	Email
Itasca County	Cory Smith	District 1 Commissioner	123 NE 4th St Grand Rapids, MN 55744	Cory.Smith@co.itasca.mn.us
Itasca County	Terry Snyder	District 2 Commissioner	123 NE 4th St Grand Rapids, MN 55744	Terry.Snyder@co.itasca.mn.us
Itasca County	John Johnson	District 3 Commissioner	123 NE 4th St Grand Rapids, MN 55744	John.Johnson@co.itasca.mn.us
Itasca County	Burl Ives	District 4 Commissioner	123 NE 4th St Grand Rapids, MN 55744	Burl.Ives@co.itasca.mn.us
Itasca County	Casey Venema	District 5 Commissioner and Chair	123 NE 4th St Grand Rapids, MN 55744	Casey.Venema@co.itasca.mn.us
Itasca County	Amanda Schultz	Deputy Clerk	123 NE 4th St Grand Rapids, MN 55744	amanda.schultz@co.itasca.mn.us
Itasca County	Brett Skyles	County Administrator	123 NE 4th St Grand Rapids, MN 55744	brett.skyles@co.itasca.mn.us
Itasca County	Katie Benes	Director	123 NE 4th St Grand Rapids, MN 55744	katie.benes@co.itasca.mn.us
Itasca County			123 NE 4th St Grand Rapids, MN 55744	assessorinfo@co.itasca.mn.us
Itasca County	Kory Cease	Land Commissioner	123 NE 4th St Grand Rapids, MN 55744	kory.cease@co.itasca.mn.us
Feeley Township	Lori Hamm	Chair	20326 County Road 10 Warba, MN 55793	dlhammer@frontiernet.net
Feeley Township	Debra Langanki	Supervisor	20736 Feeley 1 Warba, MN 55793	langanki@frontiernet.net
Feeley Township	Casey Dabrowski	Supervisor	19914 Feeley 6 Warba, MN 55793	cdabrowski@gmail.com
Feeley Township	Lori Gill	Clerk	21738 Shallow Lake Rd Warba, MN 55793	feeleytwp@hotmail.com
Goodland Township	Charles Miller	Chair	11780 Hall Rd Goodland, MN 55742	supervisor.a.goodlandtownship@gmail.com
Goodland Township	Charlene Obrecht	Supervisor	21682 County Rd 574 Goodland, MN 55742	supervisor.b.goodlandtownship@gmail.com
Goodland Township	Dave Detjen	Supervisor	21006 Co Rd 560 Goodland, MN 55742	supervisor.c.goodlandtownship@gmail.com
Goodland Township	Holly Henrickson	Clerk	13485 E County Rd 578 Goodland, MN 55742	goodlandtownship@gmail.com
Trout Lake Township	Michael Partlow	Chair	26404 Eagleview Dr Bovey, MN 55709	mike@troutlake.onmicrosoft.com
Trout Lake Township	Dwight Kessler	Supervisor	26499 Trout Lake Rd Bovey, MN 55709	dwight@troutlake.onmicrosoft.com

Local Government Distribution List

Agency	Name	Title	Address	Email
Trout Lake Township	Pamela Perry	Supervisor	26439 Birch Dr Bovey, MN 55709	pam@troutlake.onmicrosoft.com
Trout Lake Township	Gwen Rutherford	Clerk	26696 Norway Dr Bovey, MN 55709	grutherford.troutlake.twp@gmail.com
Wawina Township	Rodney Leppanen	Chair	15225 US Hwy 2 Swan River, MN 55784	townofwawina@outlook.com
St. Louis County	Annie Harala	District 1 Commissioner, Chair	100 N 5th Ave W, Room 202 Duluth, MN 55802	haralaa@stlouiscountymn.gov
St. Louis County	Patrick Boyle	District 2 Commissioner	100 N 5th Ave W, Room 202 Duluth, MN 55802	boylep@stlouiscountymn.gov
St. Louis County	Ashley Grimm	District 3 Commissioner	100 N 5th Ave W, Room 202 Duluth, MN 55802	grimma@stlouiscountymn.gov
St. Louis County	Paul McDonald	District 4 Commissioner	100 N 5th Ave W, Room 202 Duluth, MN 55802	McDonaldP@StLouisCountyMN.gov
St. Louis County	Keith Musolf	District 5 Commissioner	100 N 5th Ave W, Room 202 Duluth, MN 55802	MusolfK@StLouisCountyMN.gov
St. Louis County	Keith Nelson	District 6 Commissioner	100 N 5th Ave W, Room 202 Duluth, MN 55802	nelsonk@stlouiscountymn.gov
St. Louis County	Mike Jugovich	District 7 Commissioner, Vice Chair	100 N 5th Ave W, Room 202 Duluth, MN 55802	jugovichm@stlouiscountymn.gov
St. Louis County	Phil Chapman	Clerk	100 N 5th Ave W, Room 202 Duluth, MN 55802	chapmanp@stlouiscountymn.gov
St. Louis County		Administration	100 N 5th Ave W, Room 202 Duluth, MN 55802	administration@stlouiscountymn.gov
St. Louis County	Ryan Logan	Director	100 N 5th Ave W, Room 202 Duluth, MN 55802	loganr@stlouiscountymn.gov
St. Louis County			100 N 5th Ave W, Room 202 Duluth, MN 55802	assrdept@stlouiscountymn.gov
St. Louis County			100 N 5th Ave W, Room 202 Duluth, MN 55802	landdept@stlouiscountymn.gov
St. Louis County Economic & Community Development	Darren Jablonsky	Interim Director	301 Duluth, MN 55802	JablonskyD@stlouiscountymn.gov
Alborn Township	Dale Larson	Chairman	6388 Hwy 7 Alborn, MN 55702	Dale.Alborn@gmail.com
Alborn Township	Kurt Johnson	Supervisor A	6388 Hwy 7 Alborn, MN 55702	kurt.alborn@gmail.com
Alborn Township	Tarah Vitek	Supervisor B	6388 Hwy 7 Alborn, MN 55702	tarah.alborn@gmail.com
Alborn Township	Amanda Ellefson	Clerk	6388 Hwy 7 Alborn, MN 55702	alborn.clerk@gmail.com

Local Government Distribution List

Agency	Name	Title	Address	Email
Arrowhead Township	Angela Irvine	Clerk	4192 Brandon Rd Brookston, MN 55711	angie.irvine@yahoo.com
Brevator Township	Brenda Pallin	Clerk	P.O. Box 623 Cloquet, MN 55720	Bpallin22@gmail.com
Cedar Valley Township	Barb Peterson	Clerk	7826 Hwy 73 Floodwood, MN 55736	cedarvalleyclerk@gmail.com
Culver Township	Catherine Elder	Clerk	5292 Hwy 31 Brookston, MN 55711	eldercclerk@yahoo.com
Elmer Township	Patricia Bernsdorf	Clerk	7982 Goldfinch Rd Meadowlands, MN 55765	elmertownship@outlook.com
Floodwood Township	Rhonda Lundstrom	Clerk	11765 Clark Rd Floodwood, MN 55736	townoffloodwood@gmail.com
Hermantown City	Wayne Boucher	Mayor	5105 Maple Grove Rd Hermantown, MN 55811	mayorboucher@hermantownmn.com
Hermantown City	John Geissler	Councilor	5105 Maple Grove Rd Hermantown, MN 55811	councilorgeissler@hermantownmn.com
Hermantown City	Joe Peterson	Councilor	5105 Maple Grove Rd Hermantown, MN 55811	councilorpeter@hermantownmn.com
Hermantown City	Andy Hjelle	Councilor	5105 Maple Grove Rd Hermantown, MN 55811	councilorhjelle@hermantownmn.com
Hermantown City	Brian LeBlanc	Councilor	5105 Maple Grove Rd Hermantown, MN 55811	councilorleblanc@hermantownmn.com
Hermantown City	Alissa McClure	Clerk	5105 Maple Grove Rd Hermantown, MN 55811	amcclure@hermantownmn.com
Hermantown City	Eric Johnson	Director	5105 Maple Grove Rd Hermantown, MN 55811	eric.johnson@hermantownmn.com
Industrial Township	Amy Skluzacek	Clerk	P.O. Box 4 Saginaw, MN 55779	industrialmn@outlook.com
Lavell Township	Megan Deslongchamps	Clerk	2189 Hwy 5 Hibbing, MN 55746	deslongchamps78@gmail.com
Meadowlands Township	Debra Zubrod	Clerk	P.O. Box 115 Meadowlands 55765	debworksmdls@gmail.com
Minnesota Association of Townships	Kevin Comnick	Director	P.O. Box 267 St. Michael MN, 55376	kcomnick@mntownships.org
Ness Township	Trisha Anderson	Clerk	6072 Hwy 5 Alborn, MN 55702	nesstownship@gmail.com
Solway Township	Tami McGregor	Clerk	4029 Munger Shaw Rd Cloquet, MN 55720	solwayclerk@hotmail.com
Solway Township		Manager	Room #301 Duluth, MN 55802	landuseinfo@stlouiscountymn.gov

Local Government Distribution List

Agency	Name	Title	Address	Email
Toivola Township	Barry Margraf	Clerk	P.O. Box 151 Meadowlands, MN 55765	townshiptoivola@gmail.com
Van Buren Township	Susan Hutchinson	Clerk	11792 Parantala Rd Floodwood, MN 55736	sue.rae.hutchinson@gmail.com



30 West Superior Street, Duluth, MN 55802
218.864.6059 | www.mnpower.com

P.O. Box 47, Waukesha, WI 53187-0047
866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Agency
Address
Address

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

To Whom it May Concern:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

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As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach regarding the Project through letters, meetings, and open houses. At this stage of in the development of the Project, we want to make you aware of the Project and ask you to provide any information that you might have that would be helpful as we develop potential routes for the proposed transmission line. This information could be regarding potential route options or potential

April 18, 2025

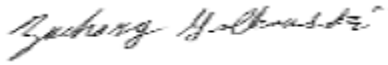
Page 2

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Please distribute this information to other officials.

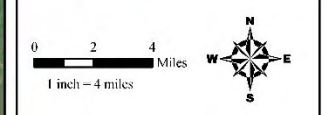
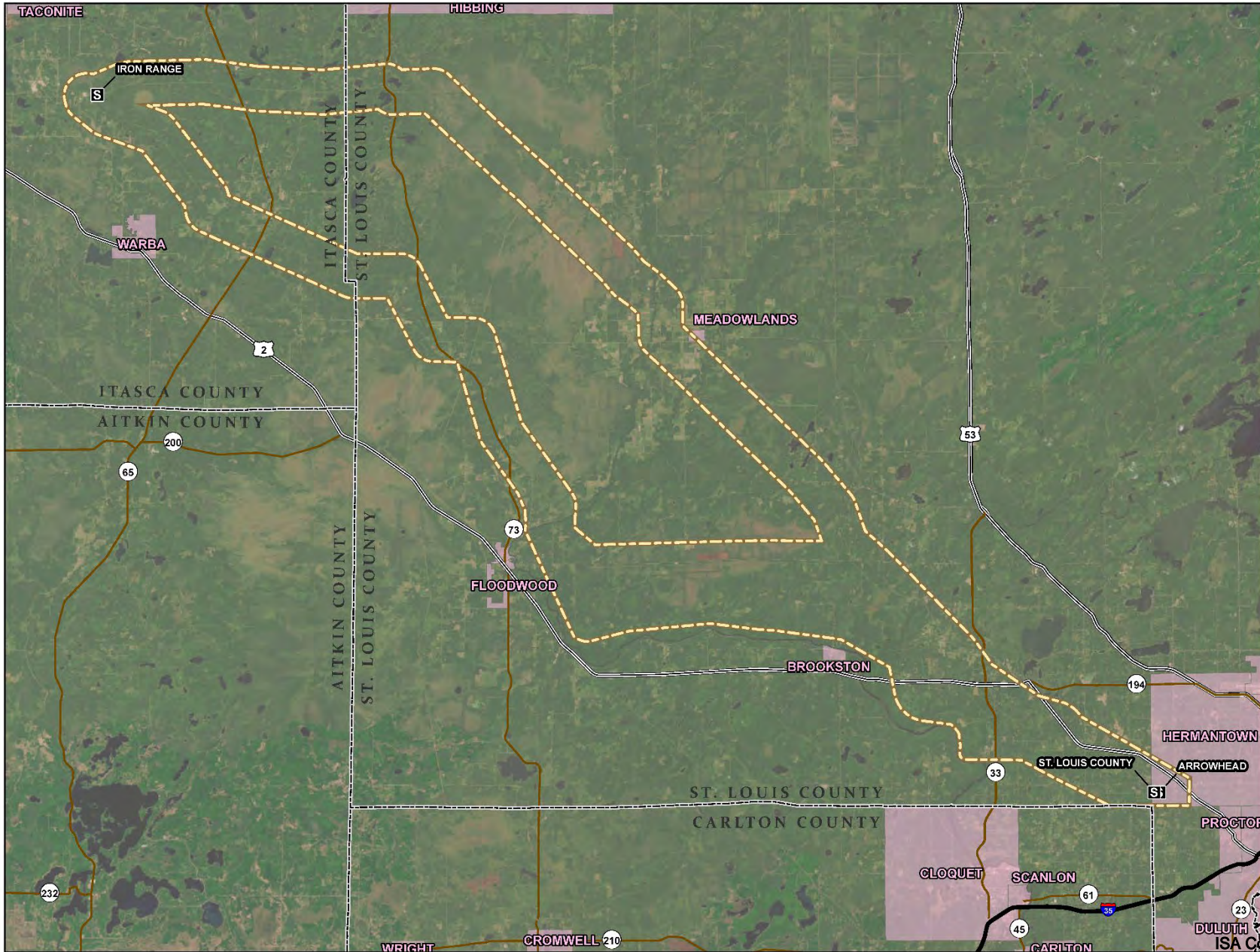
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Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures: Project Overview Map

Project Overview Map



- S** Substation
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ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 24 of 248

Local Government Distribution List - Hard copy

Agency	Name	Title	Address
Itasca Economic Development Corporation	Tamara Lowney	President & CEO	1201 SE 7th Ave Grand Rapids, MN, 55744
Wawina Township	Hjalmer Aho	Clerk	13589 Twp Rd B Wawina, MN 55736
Arrowhead Township	Steven Emerson	Chair	4650 Arrowhead Township Rd Brookston, MN 55711
Brevator Township	Chad Vermeersch	Chair	3864 Hwy 33 N Cloquet, MN 55720
Cedar Valley Township	Brian Maki	Chair	12845 Floodwood River Rd Hibbing, MN 55746
Culver Township	Robert Hendrickson	Chair	5292 Hwy 31 Brookston, MN 55711
Elmer Township	Jerry Turnboom	Chair	7468 Creek Rd Meadowlands, MN 55765
Floodwood Township	James Schminski	Chair	4856 Hwy 73 S Floodwood, MN 55736
Industrial Township	Richard Williams Jr.	Chair	P.O. Box 4 Saginaw, MN 55779
Lavell Township	Joseph Turkula	Chair	10971 Silica Rd Hibbing, MN 55746
Meadowlands Township	Carl Bergin	Chair	9563 Hwy #133 Meadowlands, MN 55765
Ness Township	Craig Maly	Chair	6939 Hwy 5 Floodwood, MN 55736
Solway Township	Scott Welsh	Chair	4134 Jeffery Rd Duluth, MN 55810
Toivola Township	Christopher Villella	Chair	10650 W Toivola Rd Toivola, MN 55765
Van Buren Township	Marilyn Arro	Chair	11647 Parantala Rd Floodwood, MN 55736



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April 18, 2025

Agency
Address
Address

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

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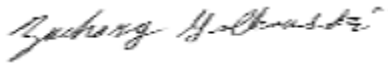
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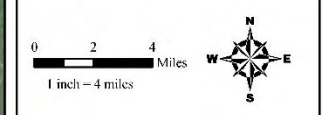
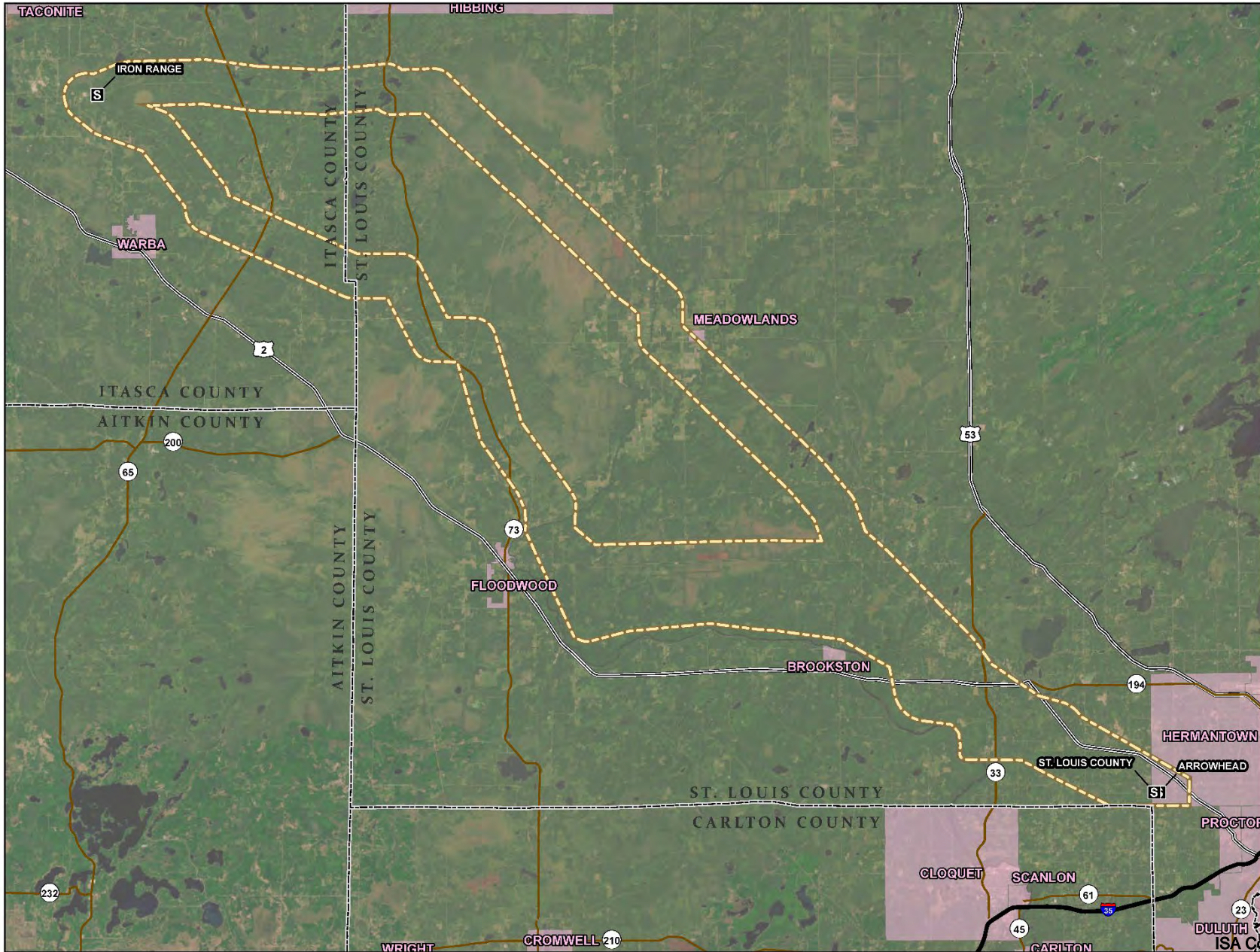
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Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

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ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

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Appendix P

Page 28 of 248

From: [Zach Golkowski \(MP\)](#)
To: [Gronhovd, Amanda \(She/Her/Hers\) \(ADM\)](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#)
Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Tuesday, April 22, 2025 2:21:16 PM
Attachments: [image001.png](#)
[image002.png](#)

Amanda,

Thank you for providing this information and link to the form. We will complete this form when the project is ready to request a review.

At this time, we are in the very preliminary routing stages of the project. There will be a series of public engagement open house meetings starting May, 20th – 22nd along the study areas. Once the project has a chance to verify opportunities and constraints, we can then narrow down the study area and begin more detailed routing and review. We will keep you updated on the process.

We look forward to working with you.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Gronhovd, Amanda (She/Her/Hers) (ADM) <amanda.gronhovd@state.mn.us>
Sent: Monday, April 21, 2025 3:17 PM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgoldkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

You don't often get email from amanda.gronhovd@state.mn.us. [Learn why this is important](#)

[EXTERNAL EMAIL] This email was sent from someone outside the company.



Freeze!

Don't slip up this winter! Remember not to click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Hi Mandy and Zach –

Thank you for the email. Please fill out our Project Review Request Form and submit it to our project review email. That will get the project into queue in our review system. You'll find the form on our website at: <https://mn.gov/admin/archaeologist/government/project-review/> under "Submit a Project Review." Once you complete the form, you can email it to the address listed in the same section. When you submit the project, please include detailed maps and any background information you have regarding the project and cultural resources. Based on the map you sent, it looks like there aren't a lot of recorded sites in the area, however, there's certainly the potential for unrecorded sites.

Thank you~
Amanda

Amanda Gronhovd (she/her)
Minnesota State Archaeologist
Kellogg Center
328 W. Kellogg Blvd.
St. Paul, MN 55102
651-201-2263



From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 7:11 PM
To: Gronhovd, Amanda (She/Her/Hers) (ADM) <amanda.gronhovd@state.mn.us>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

You don't often get email from mandy.bohnenblust@merjent.com. [Learn why this is important](#)

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Amanda Gronhovi:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust
612.746.3677 direct
612.816.2097 mobile
mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

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866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Amanda Gronhovd
Office of the State Archaeologist
MN State Archaeologist
328 W Kellogg Blvd
St. Paul, MN 55102
Amanda.Gronhovd@state.mn.us

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Amanda Gronhovd:

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April 18, 2025

Page 2

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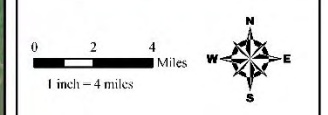
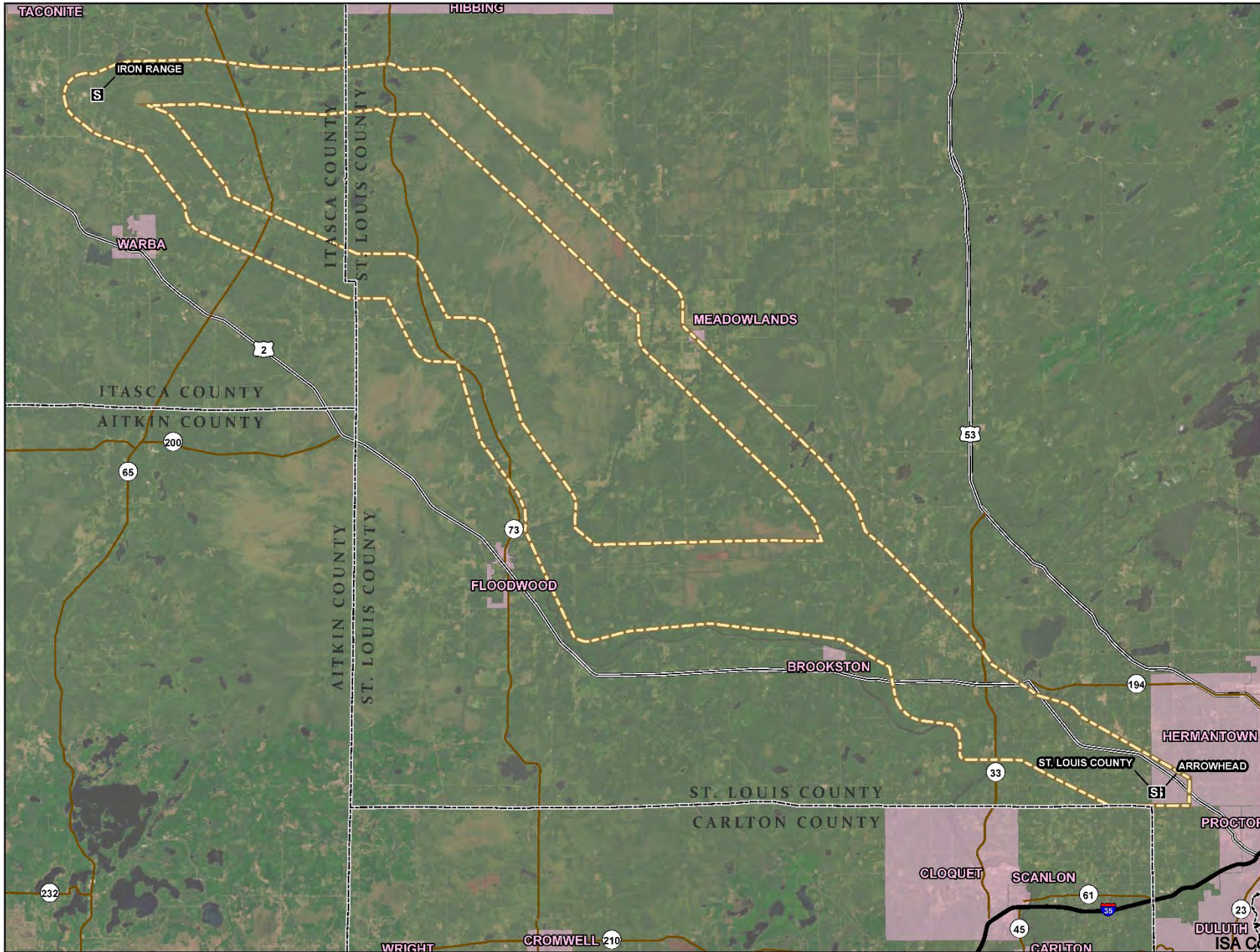
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 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 34 of 248

Project Review Procedures

The Office of the State Archaeologist (OSA) reviews development projects for the state that will potentially impact archaeological sites or cemeteries (as defined in the Private Cemeteries Act [MS 307.08]). State statute requires many of the OSA's reviews, but the OSA will also conduct project reviews for agencies or developers upon request.

Submit a Project Review Request

To submit a project for review, complete the [Project Review Request Form](#) (/admin/assets/Project%20Review%20Form%20OSA_2024_tcm36-648563.docx) and send it to osa.project.reviews.adm@state.mn.us (<mailto:osa.project.reviews.adm@state.mn.us>).

Minnesota Laws and Archaeological Reviews

The four primary review-related laws that the OSA operates under are:

1. The Field Archaeology Act ([MS 138.31-42 \(https://www.revisor.mn.gov/statutes/cite/138/full\)](#))
 - Under MS 138.40, Subd. 3, agencies must submit development plans to the OSA for projects located in areas where archaeological sites are known or predicted to exist.
 - Based on a 2006 Minnesota Attorney General opinion obtained by OSA:
 - "Agency" refers to all Minnesota governmental units, not just state agencies.
 - "Land" means land or water areas owned, leased, or otherwise subject to "the paramount right of the state, county, township, or municipality" where archaeological sites exist or might exist.
 - The OSA has 30 days to comment on the plans.
2. The Private Cemeteries Act ([MS 307.08 \(https://www.revisor.mn.gov/statutes/cite/307.08\)](#))
 - State agencies, local governments, and private developers must submit development plans to the State Archaeologist when development might impact known or suspected human burials, burial grounds, or cemeteries.
 - If the cemetery might relate to American Indians, the agencies and developers must also submit plans to the Minnesota Indian Affairs Council (MIAC).
 - The OSA and MIAC have 30 days to comment on the plans.
3. The Minnesota Environmental Policy Act ([MS 116d \(https://www.revisor.mn.gov/statutes/cite/116D/full\)](#))
 - If a proposed project might significantly impact the environment, the OSA will review the project as part of the Environmental Assessment Worksheet (EAW) or Environmental Impact Statement (EIS) process.
 - The EAW and EIS set the review deadlines.

4. The Minnesota Water Law (MS 103F

(<https://www.revisor.mn.gov/statutes/cite/103F/full#stat.103F.221>)) and rules (6120

(<https://www.revisor.mn.gov/rules/6120/full>))

- Agency reviews of proposed shoreland development projects must consider the project's impacts on significant historical resources, including archaeological sites.
- The state archaeologist can determine if sites are significant and thus eligible for the state or national historic registers (per Rules 6120.2500, Subpart 15a (<https://www.revisor.mn.gov/rules/6120.2500/>)).
- All cemeteries (as defined in MS 307.08 (<https://www.revisor.mn.gov/statutes/cite/307.08>)) are considered significant.
 - Developers and landowners may not place a structure on a significant site that affects the historical or archaeological site's value.
 - The state archaeologist must approve any structure placed nearer than 50 feet from an unplatted cemetery (per Rules 6120.3300, Subpart 3e (<https://www.revisor.mn.gov/rules/6120.3300/>)).

Reviewing Projects for Potential Archaeological Impact

When OSA conducts a project review, we first examine whether the proposed project might harm an archaeological site or cemetery. If the project might impact a recorded site, we usually ask the proposer to avoid the site if possible.

Projects cannot always avoid sites. In those cases, we will likely recommend archaeological excavation to determine whether the site is significant (Phase II Evaluation) or document the site before being destroyed (Phase III Data Recovery).

If no recorded sites are present, we then look at the general project location to see if it is in an area with a high potential to contain archaeological sites. If no recorded sites are present, but the area has a high potential for unrecorded sites, we recommend an archaeological survey.

The project proposer bears the costs of these investigations and must use a qualified professional archaeologist. If the proposed project is on non-federal public land, the archaeologist must obtain a Minnesota Archaeological License. If the project is on federal land, the archaeologist must contact the federal agency that owns the land for information on acquiring a federal permit.

Project Review Form

Please complete all the fields marked with an asterisk (*). This form is a fillable document.

After completing this form, please email your request to: OSA.Project.Reviews.adm@state.mn.us

Review Information

1. **PROJECT NAME***: [Click or tap here to enter text.](#)

A project name is required. Use the official name of the project, if available.

2. **PROJECT ID**: [Click or tap here to enter text.](#)

If this is a state project, list the state project (SP) number here.

3. **REASON FOR REVIEW***: [Click or tap here to enter text.](#)

The reason for review is required. Please provide one sentence minimum. If this review is legally required, please cite the statute.

4. **REVIEW TYPE***: [Choose an item.](#)

The review type is required. Please select an item from the drop-down menu. The options are:

- **EAW**: Environmental Assessment Worksheet. This also includes Environmental Impact Statements (EIS) and Alternative Urban Areawide Review (AUAR) processes. Please visit the Minnesota Environmental Quality Board (eqb.state.mn.us) website, under [Environmental Review](#) for more information.
- **Information Request/File Request**: Select this option if you are requesting information, not recommendations or feedback, about cultural resources on a certain piece of property.
- **Review Request**: This is the most common selection. Choose this option if this project must be reviewed under statute. Please also select this option if you are seeking recommendations and feedback about the potential impact of a project.

5. **FUNDING***: [Choose an item.](#)

6. **ORGANIZATION NAME**: [Click or tap here to enter text.](#)

Please enter your organization's name, even if you are filling this application out on behalf of another person or company. The organization submitting this form should be the organization named in the box above. If you are submitting this review form as a private individual, do not enter anything in this field.

7. **SUBMITTING ORGANIZATION TYPE:** Choose an item.

Project Information

8. **PROJECT DESCRIPTION*:** [Click or tap here to enter text.](#)

The project description is required. Please write a minimum of three sentences. Include in your description:

- **Extent of ground disturbance.** Include ground disturbance method: hand excavation, heavy equipment, etc. Please note, driving over a surface is considered ground disturbance.
 - Please describe the ground disturbance in any staging areas which are not included in project boundaries.
 - Describe the extent of vegetation removal and removal method (tree cutting, stump removal, etc.)
- **Depth of ground impact.** This can be a range.
- **Project purpose.** For the following common project types, please include the following information in your description and/or attachments to this form:
 - **Road construction:** Identify the construction method.
 - **Broadband construction:** Identify the construction method (plowing, directional boring, etc.)
 - **Housing developments:** Describe the grading for the entire site.

9. **ARCHAEOLOGICAL SITE NUMBERS:** [Click or tap here to enter text.](#)

List any known archaeological sites that are in the project site boundaries or within 1,000 feet of the boundaries. If the site numbers are known, list them above. Add multiple site numbers by separating them with a comma. If you do not know them, leave this question blank.

• **COUNTY*:** [Click or tap here to enter text.](#)

Please enter the Minnesota county where this project will take place. Add multiple counties by separating them with a comma. Do not enter counties in other states or Canada.

10. **BACKGROUND RESEARCH DONE.** Check the appropriate box if any research has been completed or is in progress. If no research has been done, leave blank.

- OSA Portal Query
- MnDOT GIS
- MnModel
- Legacy Historic cemeteries

11. **KNOWN RESOURCES ADJACENT TO REVIEW AREA:** Check the box next to any known resources that are in the project site boundaries or within 1,000 feet of the boundaries. If you do not know, leave this question blank.

- Cemeteries
- Burials
- Archaeological Sites

12. ADDITIONAL INFORMATION: Enter any relevant additional details about the project. Note any previous archaeological surveys or findings. If you would like a physical letter in response, please indicate that here.

Location Information

Location information is required.

An address is preferred for projects in a small area. Projects about specific properties or single structures should use addresses. If you enter an address, you do not need to list the PLSS location information.

For all other projects, enter location information from the Public Land Survey System (PLSS). PLSS is a method to plat (divide) real property. Visit the [ArcGIS online PLSS Map Viewer](#) to collect your PLSS location information. If there are additional PLSS entries beyond what this form provides, please continue them on an attached sheet.

13. PLSS LOCATION INFORMATION

Township:	Range:	Range Direction (E or W):	Section:
Township:	Range:	Range Direction (E or W):	Section:
Township:	Range:	Range Direction (E or W):	Section:
Township:	Range:	Range Direction (E or W):	Section:
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Township:	Range:	Range Direction (E or W):	Section:
Township:	Range:	Range Direction (E or W):	Section:

14. ADDRESS

Address Line 1: [Click or tap here to enter text.](#)

Address Line 2: [Click or tap here to enter text.](#)

City: [Click or tap here to enter text.](#)

State: [Click or tap here to enter text.](#)

Zip Code: [Click or tap here to enter text.](#)

Requestor Information

15. REQUESTED BY* (name): [Click or tap here to enter text.](#)

Please enter your name, even if you are completing this form on behalf of another person or organization.

16. REQUESTOR'S EMAIL ADDRESS*: [Click or tap here to enter text.](#)

Please enter your email address, even if you are completing this form on behalf of another person or organization.

17. REQUESTOR'S PHONE NUMBER: [Click or tap here to enter text.](#)

Please enter your phone number, even if you are completing this form on behalf of another person or organization. A phone number is not required, but it is preferred.

18. REQUESTOR'S PHYSICAL ADDRESS:

Please enter an address if you would like to receive physical correspondence.

Address Line 1: [Click or tap here to enter text.](#)

Address Line 2: [Click or tap here to enter text.](#)

City: [Click or tap here to enter text.](#)

State: [Click or tap here to enter text.](#)

Zip Code: [Click or tap here to enter text.](#)

Attachments

Please attach any photos, maps, or documents that will help us complete the review. **Any attachment that exceeds 80 MB should be compressed or divided into multiple files.**

If this project is one of the following common types, the following attachments should be included. Aerial photos or topographic maps are preferred.

- **Road construction:** Attach a map of sufficient resolution which shows the width of the road and the area of impact. Attach plans with right-of-way boundaries, if available.
- **Broadband construction:** Attach a map of sufficient resolution which shows the route. Maps should show which side of the road the route will be on.
- **Housing developments:** Attach a grading plan to this form. Also attach a lot/street layout plan.

From: [Marrier, Amy \(DNR\)](#)
To: [Zach Golkowski \(MP\)](#); [Mandy Bohnenblust](#); [Marissa Honeycutt](#); [Dan Flo](#)
Cc: [Means, Angela \(DNR\)](#); [Rokala, Joe A \(DNR\)](#)
Subject: RE: [EXTERNAL MAIL] 345 kV Project Early Coordination
Date: Wednesday, April 23, 2025 7:35:43 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Sounds great, we'll stay tuned on our end until we hear from you.

Thank you,

Amy

From: Zach Golkowski (MP) <zgolkowski@mnpower.com>
Sent: Wednesday, April 23, 2025 9:15 AM
To: Marrier, Amy (DNR) <amy.marrier@state.mn.us>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Dan Flo <dan.flo@merjent.com>
Cc: Means, Angela (DNR) <Angela.Means@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>
Subject: RE: [EXTERNAL MAIL] 345 kV Project Early Coordination

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Hi Amy,

Thank you for your response. The ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We are currently requesting feedback from local, state, and federal agencies regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public.

We would also appreciate early coordination with the DNR and as we narrow down the Study Area and identify possible routes, we'd like to work with you to discuss possible state lands/public water crossings. The Applicants plan to file a Certificate of Need and Route Permit Application in early 2026 with field surveys and additional local, state, and federal permitting, as needed, following in mid- to late-2026.

I don't think this will be as strenuous as NRP and I'm more than happy to go over the two proposed study areas with you when convenient.

We look forward to working with you on this project and would be happy to host a meeting to answer questions/coordinate as the project develops.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Marrier, Amy (DNR) <amy.marrier@state.mn.us>

Sent: Monday, April 21, 2025 2:34 PM

To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Zach Golkowski (MP) <zgolkowski@mnpower.com>

Cc: Means, Angela (DNR) <Angela.Means@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>

Subject: [EXTERNAL MAIL] 345 kV Project Early Coordination



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Good afternoon,

A letter was received by the Department of Natural Resources from MN Power and ATC for a 345 kV Transmission Line Project in Itasca and St. Louis Counties. We're hoping you might have a list of parcels you are planning to cross for this project and could send them our way. We'd like to be able to work on some early coordination if there are state lands and likely public waters involved. We are also looking to request further information such as timing, etc.

Thank you,

Amy Marrier

NE Region State Program Administrator Principal | Division of Lands and Minerals

Minnesota Department of Natural Resources

1201 East Highway 2

Grand Rapids, MN 55744

Phone: 218-328-8922

Email: amy.marrier@state.mn.us

mndnr.gov





30 West Superior Street, Duluth, MN 55802
218.864.6059 | www.mnpower.com

P.O. Box 47, Waukesha, WI 53187-0047
866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Shelly Patten
Minnesota Department of Natural Resources
Regional Director
1201 E Hwy 2
Grand Rapids, MN 55744
Shelly.patten@state.mn.us

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Shelly Patten:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. We appreciate your assistance as we evaluate siting and routing information and work through the Commission’s approval process.

April 18, 2025

Page 2

On behalf of the Applicants, Merjent will submit a formal Natural Heritage Review Request through the Minnesota Department of Natural Resources' ("DNR") Minnesota Conservation Explorer ("MCE"). The Applicants look forward to working with the DNR to avoid and minimize impacts to state-protected species.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgoldowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

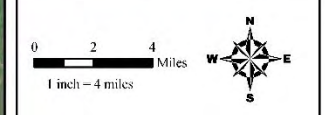
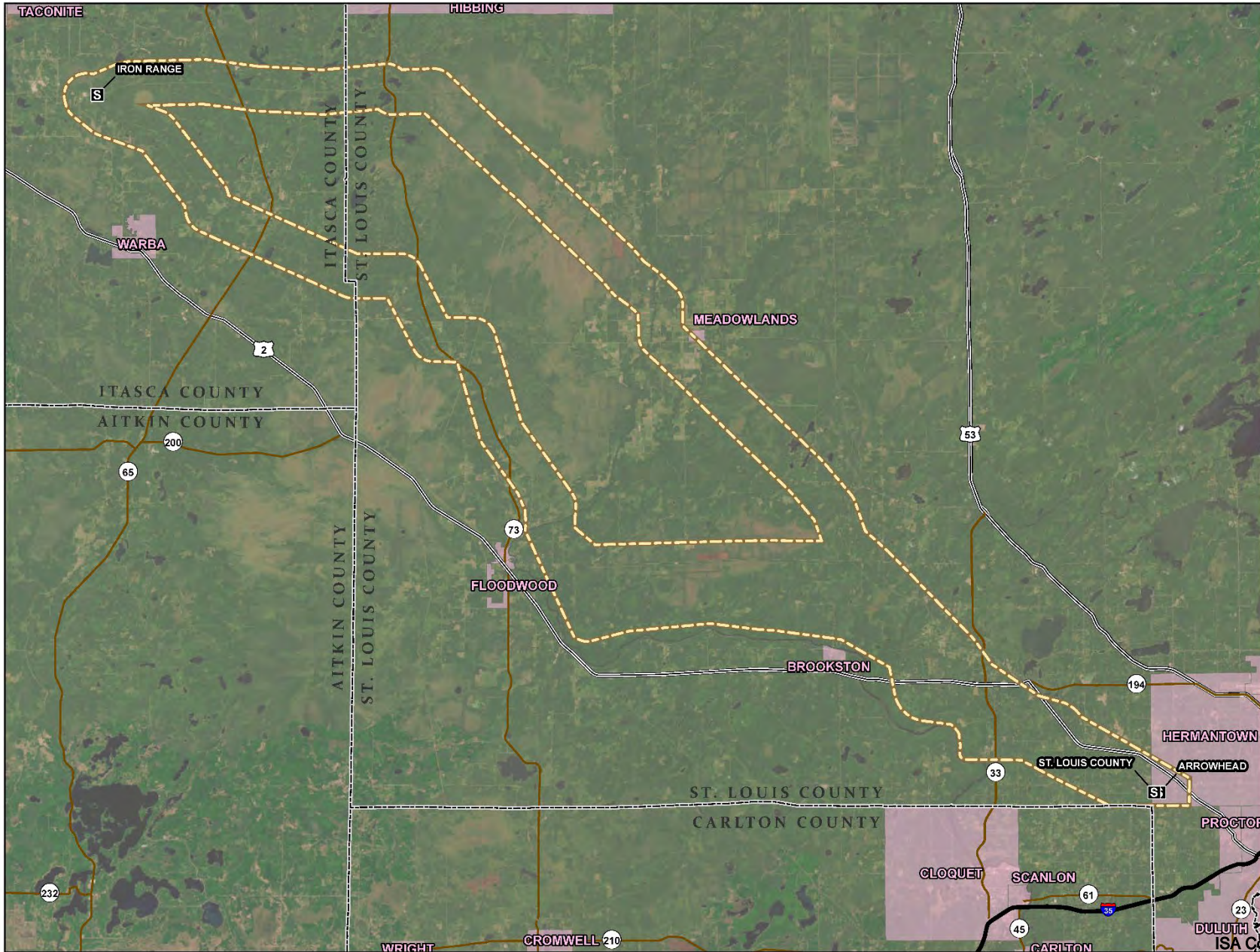
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 46 of 248

From: Zach Golkowski (MP) <zgolkowski@mnpower.com>
Sent: Wednesday, April 23, 2025 12:03 PM
To: Wilson, Ashley M (FAA); Mandy Bohnenblust
Cc: Dan Flo; Marissa Honeycutt; Duchatellier, Marla (FAA)
Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

Hi Ashley,

Thank you for the detailed response and providing the additional information regarding the Approach and Transitional Surfaces at the Duluth airport. At this time, the ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We are currently requesting feedback from local, state, and federal agencies regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public.

The applicants will use the Notice Criteria Tool link to determine whether notice is required as the project develops. We may reach out to you and/or Marla for additional early coordination on the project.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366
C: 218-428-5582

From: Wilson, Ashley M (FAA) <Ashley.M.Wilson@faa.gov>
Sent: Monday, April 21, 2025 7:57 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Duchatellier, Marla (FAA) <Marla.Duchatellier@faa.gov>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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[EXTERNAL EMAIL] This email was sent from someone outside the company.

Don't slip up this winter! Remember not to click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Mandy,

Thank you for reaching out.

I do not have any comments about the proposed 62-mile transmission line. Unfortunately, I cannot know the impact a structure will have until it is filed and has been reviewed by the 11 internal and external offices. I would just be aware the proposed transmission line appears to be within distance of the Approach and Transitional Surfaces at Duluth International Airport. If the proposed structure(s) penetrate the surface(s), it may require a 37-day public circularization process.

Additionally, please know:

1. You may use the Notice Criteria Tool link to determine whether notice is required. The tool is based on Title 14, Code of Federal Regulations, Part 77 (14 CFR Part 77) OR you can elect to file all transmission line structures.

2. In accordance with 14 CFR Part 77, you must provide notice at least 45 days before the start date of the proposed construction or alteration or the date an application for a construction permit is filed, whichever is earliest. However, we recommend that you file notice 60-90 days before planned construction. The aeronautical study process includes evaluations by various lines of business, and any identified impacts must be resolved before a final agency determination is issued. In addition, the proposal may warrant a 37-day public notice to obtain aeronautical impacts. There is no guarantee that a final agency determination will be issued at the end of 45 days, so the earlier you file, the better. 14 CFR Part 77 does not carry provisions for waivers or exemptions, so there is no way to shorten or bypass this process.

3. Each determination may be issued for one (1) 18-month period and each determination is eligible for one (1) 18-month extension. If construction has not started by the expiration date of the 18-month extension, you must re-file as a new study.

Please take these timeframes into consideration when filing before construction is scheduled to begin.

I have Cc'd Mrs. Marla Duchatellier into this conversation as she is the Technician for all studies filed in Minnesota and will have first eyes on the studies once filed. If she has any questions during her review, she will be in contact with you.

Here is an approximate representation of the Approach (grey shading) and Transitional (yellow shading) Surfaces at Duluth International Airport and where the transmission line may penetrate.



Thank you.

Ashley M. Wilson
Federal Aviation Administration
Obstruction Evaluation Group
AJV-A520
10101 Hillwood Parkway
Fort Worth, TX 76177
Office: 817-222-4244
Ashley.M.Wilson@faa.gov

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 7:12 PM
To: Wilson, Ashley M (FAA) <Ashley.M.Wilson@faa.gov>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Ashley Wilson:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust
612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

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P.O. Box 47, Waukesha, WI 53187-0047
866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Ashley Wilson
Federal Aviation Administration
Air Traffic Specialist
6020 28th Ave S, Ste. 201
Minneapolis, MN 55450
ashley.m.wilson@faa.gov

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Ashley Wilson:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that

April 18, 2025

Page 2

will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission's approval process.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

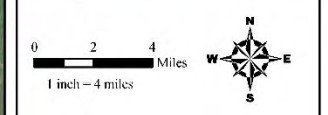
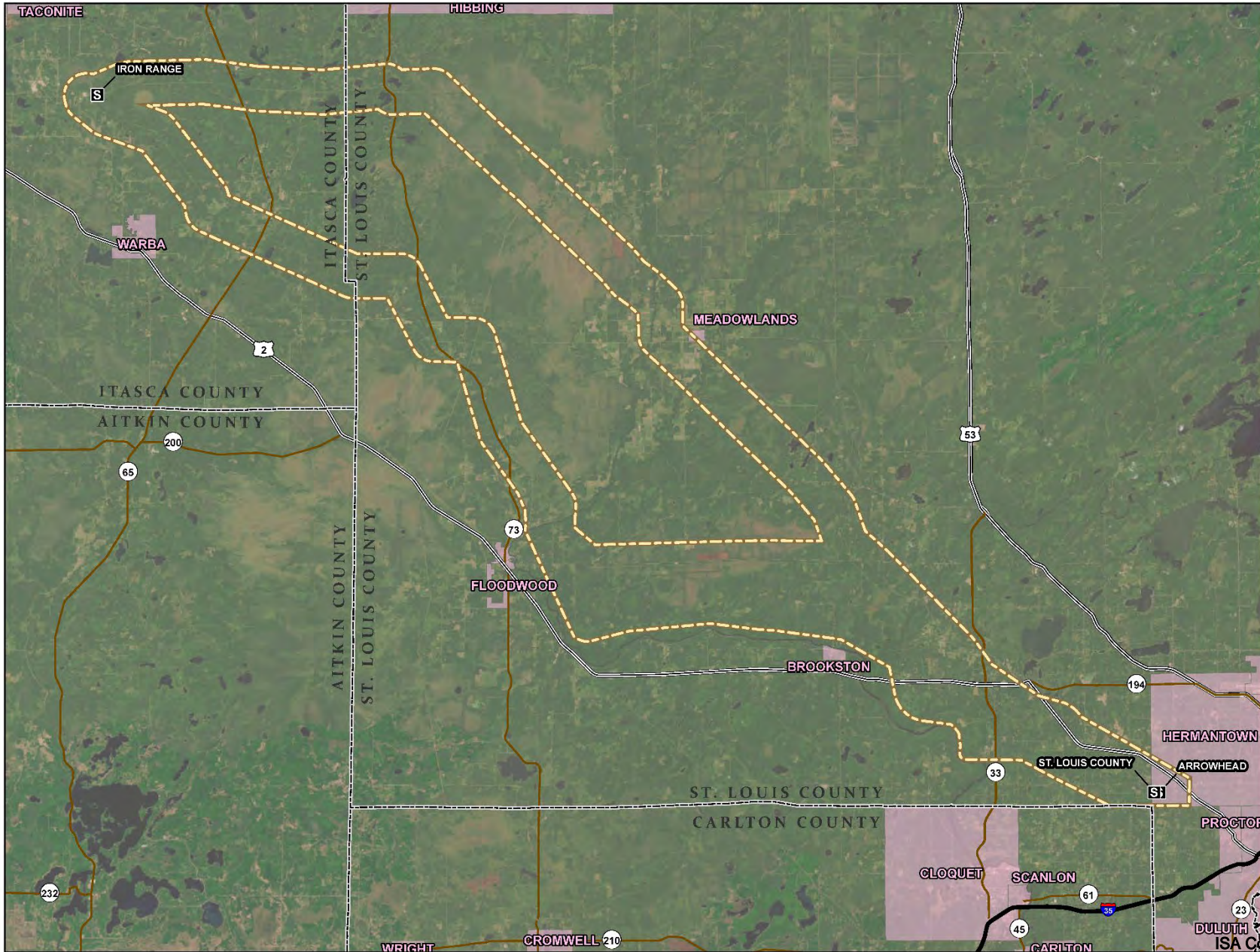
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

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- County Boundary

ISA Project
Minnesota Power
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Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 54 of 248

From: Duchatellier, Marla (FAA) <Marla.Duchatellier@faa.gov>
Sent: Wednesday, April 23, 2025 12:49 PM
To: Zach Golkowski (MP); Mandy Bohnenblust
Cc: Dan Flo; Marissa Honeycutt
Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

My pleasure.

Peace & Love,

Marla Duchatellier
OE Technician: Alabama, Kansas, Minnesota, and Nebraska State
Obstruction Evaluation Group (OEG), AJV-A520
Office: 817-222-5323
Marla.Duchatellier@faa.gov
<https://oeaaa.faa.gov>



- 1) To see if your structure is required to file with FAA, please go to:
<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>
- 2) OEAAA.faa.gov Filing Instructions: <https://oeaaa.faa.gov/oeaaa/external/content/instructions.jsp>
- 3) General FAQs: <https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=generalFAQs>
- 4) DOT/FAA Obstruction Marking & Lighting Advisory Circular (AC 70/7460-1M):
https://www.faa.gov/regulations_policies/advisory_circulars/index.cfm/go/document.information/documentID/1030047
- 5) Light Outage Reporting: <https://oeaaa.faa.gov/oeaaa/external/content/lightOutageReporting.jsp>
- 6) Helpdesk (System Issues/Support): 202-580-7500/Email: oeaaa_helpdesk@cghitech.com

From: Zach Golkowski (MP) <zgolkowski@mnpower.com>
Sent: Wednesday, April 23, 2025 2:39 PM
To: Duchatellier, Marla (FAA) <Marla.Duchatellier@faa.gov>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

CAUTION: This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Marla,

Much appreciated!

Aeronautical studies and determinations are definitely on our list of to-do items. We look forward to working with you on this project and thank you for the information provided.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Duchatellier, Marla (FAA) <Marla.Duchatellier@faa.gov>

Sent: Wednesday, April 23, 2025 2:21 PM

To: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Cc: Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>

Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project



Freeze!

[EXTERNAL EMAIL] This email was sent from someone outside the company.

Don't slip up this winter! Remember not to click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Hello Zach,

Please reach out to me if you have any more questions.

There are no fees associated with any part of an aeronautical study or obtaining a determination from the FAA.

Please click on the Notice Criteria link below to find out if you need to file.

<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>

The instructions are below and attached.

To file an aeronautical study, you'll need an account on our website, <https://oeaaa.faa.gov>. Click on the "New User Registration" link, located about 2/3 of the way down the left side of the web page, and fill out the online form. Once you've completed that and logged in to your portal page, click on the "Add New Case (Off Airport)" link at the top of the center column of the web page. The very first time you do this, you'll be asked to enter your sponsor information. This will largely be a repeat of the information you entered when you registered on the web page. For all subsequent submission, your sponsor information will just be an entry on a dropdown menu at the top of the online (7460-1).

Once your account has been created and you're logged on to your portal page, click on the "Add New Case (Off Airport)" if it's not on airport property, or "Add New Case (On Airport)" if it's on airport property, link at the top of the center (Off Airport) or top of the right (On Airport) column of the page. The very first time you do this; you'll be asked for sponsor information. This will largely be a repeat of the info you entered when you registered for the website, and unless you add additional sponsors later, you'll never have to enter sponsor information on any future studies. Once the sponsor information has been entered, you can move on to the online FAA Form 7460-1.

For a crane, the type of notice will be "Construction," and the duration will be "Temporary." Enter an estimated duration for the crane activity or window, and an estimated work schedule (don't worry, we won't hold you to it; it's just to give us an idea of about when you'll be operating). Most of the rest is self-explanatory. For the coordinates, use the latitude and longitude of the point of the crane operating area closest to the nearest airport or runway, and use the site elevation of the highest point of the crane's operating area (even if the closest and highest points aren't at the same location). This will give us a worst-case scenario. Some items with red asterisks aren't really required, such as Current Height. If you're requesting a desired height but can possibly do the job at a lower tip height, enter the lower height value in the "Minimum Operating Height" block. If, for some reason, it won't allow you to enter anything into the block, don't worry about it (that sometimes happens). Any crane higher than 200' AGL is going to require marking and lighting, usually a red light and an obstruction flag at the highest point (or, for a luffing jib, the highest point when the jib is raised and the highest point when the jib is at its lowest point, if they're different), so you can choose red lights and flags from the "Requested Marking/Lighting" menu, or you can just request "None" and we'll tell you if you need it or not. Select "Crane" for "Structure Type," and you can assign any name you like for the "Structure Name." The description of the location can be a street address or an approximate location on the parcel of land where the crane will be operating, and the description of the proposal can just state that you're using a crane for construction of a building or whatever its purpose may be. If the building has already been studied by the FAA (and in this case, it should have), please include the Aeronautical Study Number(s) of the permanent building.

Peace & Love,

Marla Duchatellier

OE Technician: Alabama, Kansas, Minnesota, and Nebraska State

Obstruction Evaluation Group (OEG), AJV-A520

Office: 817-222-5323

Marla.Duchatellier@faa.gov

<https://oeaaa.faa.gov>



1) To see if your structure is required to file with FAA, please go to:

<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>

2) OEAAA.faa.gov Filing Instructions: <https://oeaaa.faa.gov/oeaaa/external/content/instructions.jsp>

3) General FAQs: <https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=generalFAQs>

4) DOT/FAA Obstruction Marking & Lighting Advisory Circular (AC 70/7460-1M):

https://www.faa.gov/regulations_policies/advisory_circulars/index.cfm/go/document.information/documentID/1030047

5) Light Outage Reporting: <https://oeaaa.faa.gov/oeaaa/external/content/lightOutageReporting.jsp>

6) Helpdesk (System Issues/Support): 202-580-7500/Email: oeaaa_helpdesk@cghitech.com

From: Zach Golkowski (MP) <zgolkowski@mnpower.com>
Sent: Wednesday, April 23, 2025 2:03 PM
To: Wilson, Ashley M (FAA) <Ashley.M.Wilson@faa.gov>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Duchatellier, Marla (FAA) <Marla.Duchatellier@faa.gov>
Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

CAUTION: This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Ashley,

Thank you for the detailed response and providing the additional information regarding the Approach and Transitional Surfaces at the Duluth airport. At this time, the ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We are currently requesting feedback from local, state, and federal agencies regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public.

The applicants will use the Notice Criteria Tool link to determine whether notice is required as the project develops. We may reach out to you and/or Marla for additional early coordination on the project.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366
C: 218-428-5582

From: Wilson, Ashley M (FAA) <Ashley.M.Wilson@faa.gov>
Sent: Monday, April 21, 2025 7:57 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Duchatellier, Marla (FAA) <Marla.Duchatellier@faa.gov>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

You don't often get email from ashley.m.wilson@faa.gov. [Learn why this is important](#)



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Mandy,

Thank you for reaching out.

I do not have any comments about the proposed 62-mile transmission line. Unfortunately, I cannot know the impact a structure will have until it is filed and has been reviewed by the 11 internal and external offices. I would just be aware the proposed transmission line appears to be within distance of the Approach and Transitional Surfaces at Duluth International Airport. If the proposed structure(s) penetrate the surface(s), it may require a 37-day public circularization process.

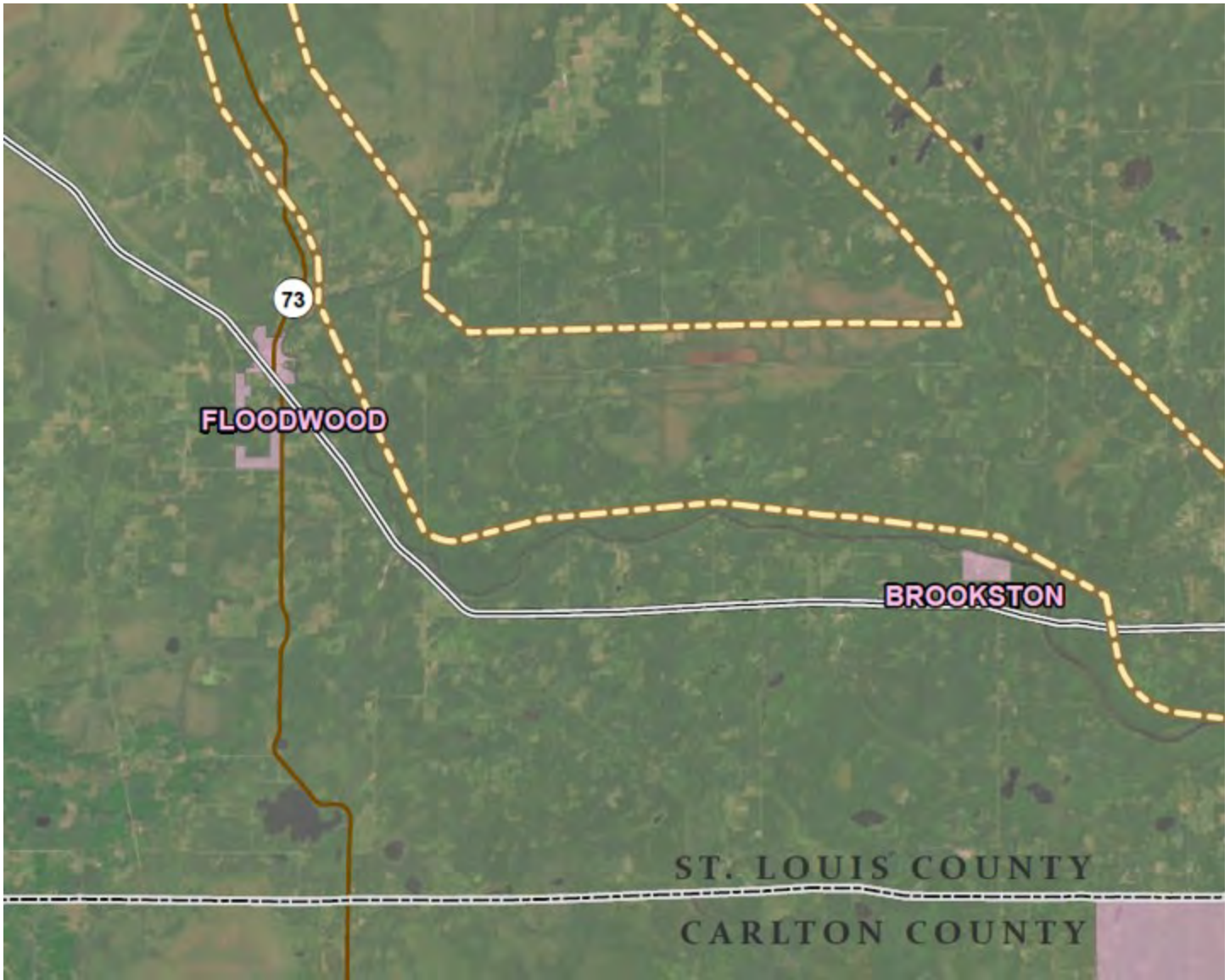
Additionally, please know:

1. You may use the Notice Criteria Tool link to determine whether notice is required. The tool is based on Title 14, Code of Federal Regulations, Part 77 (14 CFR Part 77) OR you can elect to file all transmission line structures.
2. In accordance with 14 CFR Part 77, you must provide notice at least 45 days before the start date of the proposed construction or alteration or the date an application for a construction permit is filed, whichever is earliest. However, we recommend that you file notice 60-90 days before planned construction. The aeronautical study process includes evaluations by various lines of business, and any identified impacts must be resolved before a final agency determination is issued. In addition, the proposal may warrant a 37-day public notice to obtain aeronautical impacts. There is no guarantee that a final agency determination will be issued at the end of 45 days, so the earlier you file, the better. 14 CFR Part 77 does not carry provisions for waivers or exemptions, so there is no way to shorten or bypass this process.
3. Each determination may be issued for one (1) 18-month period and each determination is eligible for one (1) 18-month extension. If construction has not started by the expiration date of the 18-month extension, you must re-file as a new study.

Please take these timeframes into consideration when filing before construction is scheduled to begin.

I have Cc'd Mrs. Marla Duchatellier into this conversation as she is the Technician for all studies filed in Minnesota and will have first eyes on the studies once filed. If she has any questions during her review, she will be in contact with you.

Here is an approximate representation of the Approach (grey shading) and Transitional (yellow shading) Surfaces at Duluth International Airport and where the transmission line may penetrate.



Thank you.

Ashley M. Wilson
Federal Aviation Administration
Obstruction Evaluation Group
AJV-A520
10101 Hillwood Parkway
Fort Worth, TX 76177
Office: 817-222-4244
Ashley.M.Wilson@faa.gov

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 7:12 PM
To: Wilson, Ashley M (FAA) <Ashley.M.Wilson@faa.gov>
Cc: Zach Golkowski (MP) <zgolowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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ISA Combined Application

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 60 of 248

Ashley Wilson:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust
612.746.3677 direct
612.816.2097 mobile
mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

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218.864.6059 | www.mnpower.com

P.O. Box 47, Waukesha, WI 53187-0047
866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Ashley Wilson
Federal Aviation Administration
Air Traffic Specialist
6020 28th Ave S, Ste. 201
Minneapolis, MN 55450
ashley.m.wilson@faa.gov

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Ashley Wilson:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that

April 18, 2025

Page 2

will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission's approval process.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

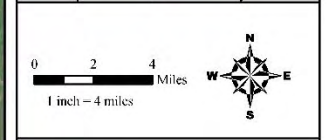
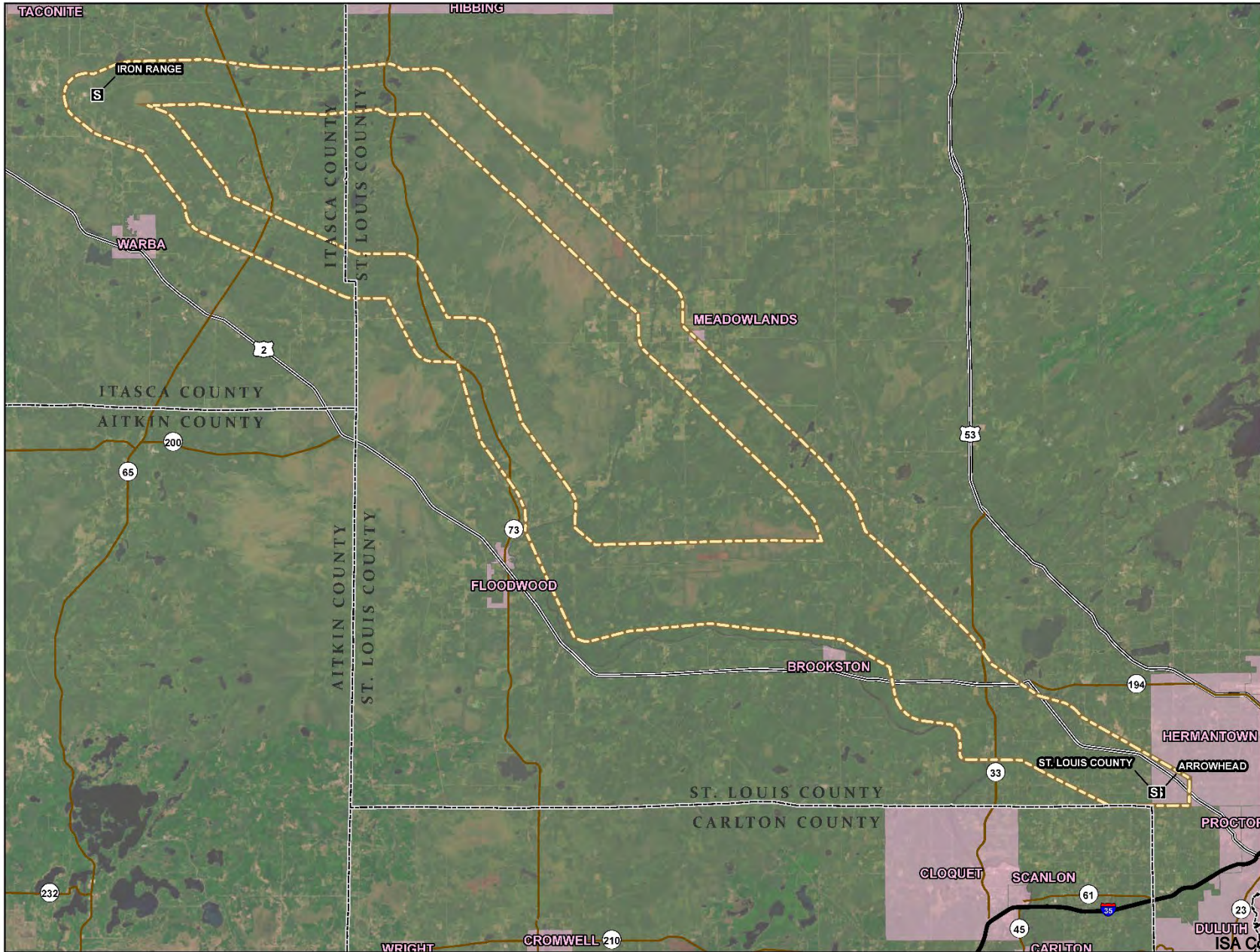
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 65 of 248



30 West Superior Street, Duluth, MN 55802
218.864.6059 | www.mnpower.com

P.O. Box 47, Waukesha, WI 53187-0047
866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Marla Duchatellier
Federal Aviation Administration
Air Traffic Technician
6020 28th Ave S, Ste. 201
Minneapolis, MN 55450
Marla.Duchatellier@faa.gov

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Marla Duchatellier:

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The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

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April 18, 2025

Page 2

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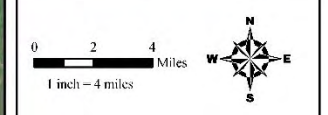
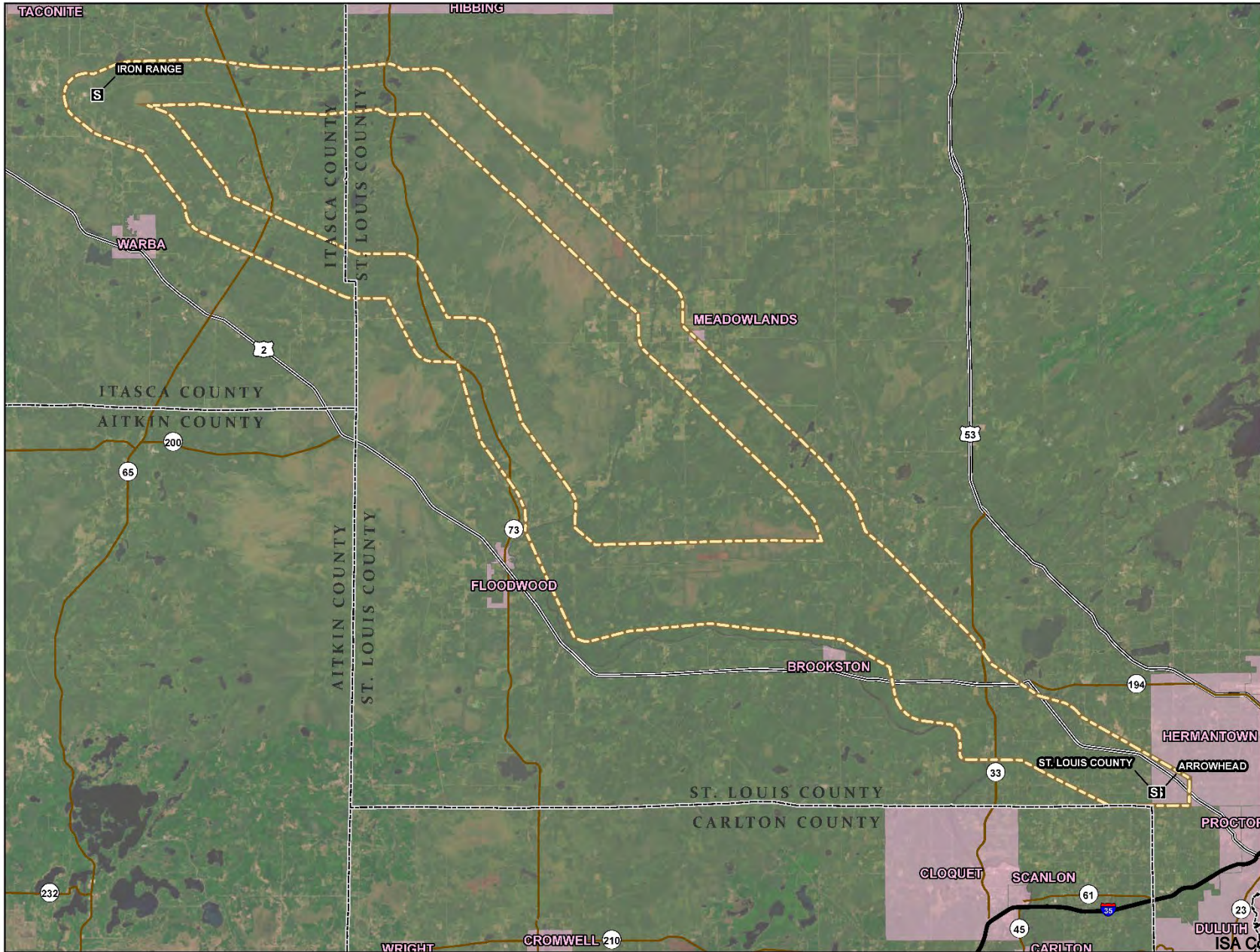
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 68 of 248

[Registration](#)[Login](#)

Due to the government shutdown the Federal Aviation Administration (FAA) is unable to accept any new notices under 14 CFR Part 77. Previously submitted cases will be processed on a limited basis. When staff return to the office e-filing submissions will become available and applications will be processed as quickly as possible in the order submitted.

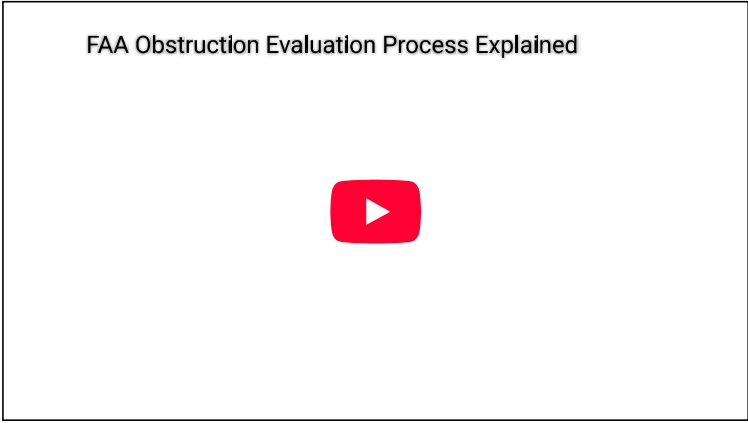
Pending a formal determination, all submittals should be presumed to be a hazard to air navigation until advised otherwise. Please continue to use the OE/AAA system to file the following:

- **Airport Planning & Non-Part 77 Notices:** Processing of new case submissions and previously submitted cases will be delayed.
- **Extension Requests:** Please file extension requests in accordance with the determination deadline. The determination deadline cannot be extended. Any extension requests not submitted on time will not be accepted.
- **NOTAMS:** If you already possess a valid FAA-issued determination and need to make your three-day prior notice to the FAA that a temporary structure will be erected, please continue to use the OE/AAA system to request a temporary NOTAM. For emergency notifications involving structures that may impact the National Airspace System, please contact: (405) 203-1417, Monday-Friday, 7:00 a.m. - 3:30 p.m. CST.

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- [FAQ & Resources](#)



The US Office of Management and Budget (OMB) approves the Federal Aviation Administration (FAA) to collect information from sponsors of certain construction or alteration projects that may affect the National Airspace System (NAS). The rules for the collection are promulgated to the public in Title 14 of the Code of Federal Regulations (14 CFR) [Part 77](#). The OE/AAA Web Portal enables individuals or organizations engaged in sponsoring construction or alteration projects that meet the regulatory reporting requirements to easily notify the Agency of their intent and to request an Aeronautical Study from FAA.



The OE/AAA Web Portal also provides tools and resources for interested parties, including but not limited to, other federal, state, and local government agencies, pilots, aviation groups, and the public in general to easily retrieve aeronautical study data that has been processed by FAA. These aeronautical studies are conducted by FAA to evaluate the construction or alteration project for compliance with governing laws, policies and orders that promote safety in air navigation and ensure the safe, efficient use and preservation of the navigable airspace. While most aeronautical study data available for retrieval through this Web Portal does not require you to register an account, sponsors reporting information to specifically request an FAA aeronautical study must register.

I want to:
Pre-Screen to see if I meet FAA Notice Requirements
File a FAA 7460-1 or 7460-2 Notice
Search FAA aeronautical study case files
Report an obstruction light outage/light restored
Use an OE/AAA public web service

Frequently Asked Questions (FAQs):

- [Where can I find the OE/AAA User Manual?](#)
- [Where do I login to OE/AAA e-filing?](#)
- [Is there a fee for filing notice of 7460-1 or 7460-2 with FAA?](#)

- [What happens after I submit notice?](#)
- [What happened to the DoD Preliminary Screening Tool that used to be on this FAA site?](#)
- [What is the difference between an obstacle and obstruction?](#)



Federal Aviation
Administration

FEDERAL AVIATION ADMINISTRATION

OE/AAA®

OBSTRUCTION EVALUATION / AIRPORT AIRSPACE ANALYSIS

DESK REFERENCE GUIDE

SUBJECT: Add a New Case (Off Airport)

**You are required to have a registered e-filing account*

All references to software products remain the protected trademarks of their manufacturers. The instructions in this document may reference Microsoft application(s). This is not meant in any way to express a preference for any particular product since there are many different browsers, programs, and operating systems available to the user. For simplicity only, one brand/product is used in the examples that follow.



Federal Aviation Administration

If you've successfully registered, you can use your OE/AAA account to file your Notice of Proposed Construction or Alteration.

Note1: Exit this guide if you are filing an Off Airport Notice of Proposed Construction or Alteration for Wind Turbine /Met Tower (w/WT Farm) or Wind Turbine-Barge Crane structures.

Note2: Use this DRG to Add a New Case (Off Airport) to include:

- E-file a crane mounted on a barge vessel for construction - Barge Crane (not associated with a wind turbine).
- E-file a Met Tower, not associated with a wind turbine farm, select structure type 'Met Tower (non-WT Farm).'
- E-file a building with an auxiliary wind turbine mounted on a building or structure attached to a building, not associated with a wind turbine farm; select 'Building w/Wind Turbine'.
- For a wind turbine (not associated with a wind turbine farm), select "Wind Turbine."

Note3: To e-file **Wind Turbine /Met Tower (w/WT Farm) / Wind Turbine-Barge Crane** structure types, refer to the "Add a New Case (Off Airport) for Wind Turbine /Met Tower (w/WT Farm) /WT-Barge Crane" desk reference guide or the "Add Multiple Cases (Off Airport) for Wind Turbine /Met Tower (w/WT Farm)/ WT-Barge Crane" desk reference guide.



Federal Aviation Administration

Note4: If you're e-filing a **large Off Airport project** with the following eligible Structure Types:

- Antenna Tower
- Billboard
- Bridge
- Building
- Building w/Wind Turbine
- Catenary Wire
- Cell-On-Wheels
- Chimney
- Drilling Rig
- Feasibility Study
- Flagpole
- High Mast Illumination
- Landfill
- Light Pole
- Lighting Study
- Met Tower (non-WT Farm)
- Monopole
- Other w/Antenna
- Other w/o Antenna
- Power Line
- Sign
- Solar Panel
- Solar Tower
- Stack
- Tower
- Transmission Line
- Utility Pole
- Waste Management Facility
- Water Tank
- Workover Rig

Review the "Add Multiple Cases (Off Airport)" desk reference guide (DRG) to consider e-filing via the OE/AAA data import feature.



Add a New Case (Off Airport)

The OE/AAA electronic filing (e-file) system allows you to:

- Submit an FAA Form 7460-1 via an electronic data screen.
- Generate a map directly from your account to be submitted electronically with your filing.
- Track the status of your case as it moves through the study process.

From your OE/AAA Portal Page you have:

- Instant access to your determination, requests for additional information, etc... as they are issued by the FAA.
- The ability to attach surveys, and additional background information directly to your electronic case file(s).

Create a New Case

To create a new case, click the **Add New Case (Off Airport)** link. This will bring up the *Notice of Proposed Construction or Alteration* Page. Complete each section according to the instructions below.

OE/AAA Portal Page

My Account	Off Airport Construction (includes on Military Airport)
Name: User Name: Login Time: IP Address: Actions:	My Cases (Off Airport) Add New Case (Off Airport) Add Multiple Cases (Off Airport) Add Supplemental Notice (7460-2 Form) My Sponsors Add New Sponsor Off Airport Contacts My Circ Comments

Important: You must complete all required fields (indicated with an asterisk *) to successfully save your case. Missing data will result in a warning message at the top of your page identifying the required information.



Notice of Proposed Construction or Alteration - Off Airport

Sponsor (person, company, etc. proposing this action) * Sponsor: [dropdown]

Construction / Alteration Information

* Notice Of: [dropdown]
 * Duration: [dropdown]
 if Temporary: Months: [input] Days: [input]
 Work Schedule - Start: [input] (mm/dd/yyyy)
 Work Schedule - End: [input] (mm/dd/yyyy)
 *For temporary cranes-Does the permanent structure require separate notice to the FAA? To find out, use the Notice Criteria Tool. If separate notice is required, please ensure it is filed. If it is not filed, please state the reason in the Description of Proposal.
 State Filing: [dropdown]

Structure Summary

* Structure Type: [dropdown]
 * Structure Name: [input]
 NOTAM Number: [input]
 FCC Number: [input]
 Prior ASN: [dropdown] - [dropdown] - [input] - OE [Validate Prior]

Structure Details

* Latitude: [input]° [input]' [input]" N
 * Longitude: [input]° [input]' [input]" W
 * Horizontal Datum: NAD83
 * Site Elevation (SE): [input] (nearest foot)
 * Structure Height (AGL): [input] (nearest foot)
 * Current Height (AGL): [input] (nearest foot)
 * For notice of alteration or existing provide the current AGL height of the existing structure. Include details in the Description of Proposal
 Minimum Operating Height (AGL): [input] (nearest foot)
 * For aeronautical study of a crane or construction equipment the maximum height should be listed above as the Structure Height (AGL). Additionally, provide the minimum operating height to avoid delays if impacts are identified that require negotiation to a reduced height. If the Structure Height and minimum operating height are the same enter the same value in both fields.
 * Requested Marking/Lighting: [dropdown]
 Other: [input]
 Aircraft Detection Lighting System(ADLS):
 * Only check this box if you are proposing the installation and use of an Aircraft Detection Lighting System
 Yes
 * Current Marking/Lighting: [dropdown]
 Other: [input]
 * Nearest City: [input]
 * Nearest State: [dropdown]
 * Description of Location: On the Project Summary page upload any certified survey.
 [input]
 * Description of Proposal: [input]

Proposed Frequency Bands

Select any combination of the applicable frequencies/powers identified in the Colo Void Clause Coalition, Antenna System Co-Location, Voluntary Best Practices, effective 21 Nov 2007, to be evaluated by the FAA with your filing. If not within one of the frequency bands listed below, manually input your proposed frequency(ies) and power using the Add Specific Frequency link.

[Add Specific Frequency](#)

	Low Freq	High Freq	Freq Unit	ERP	ERP Unit
<input type="checkbox"/>	6	7	GHz	55	dBW
<input type="checkbox"/>	6	7	GHz	42	dBW
<input type="checkbox"/>	10	11.7	GHz	55	dBW
<input type="checkbox"/>	10	11.7	GHz	42	dBW
<input type="checkbox"/>	17.7	19.7	GHz	55	dBW
<input type="checkbox"/>	17.7	19.7	GHz	42	dBW
<input type="checkbox"/>	21.2	23.6	GHz	42	dBW
<input type="checkbox"/>	21.2	23.6	GHz	55	dBW
<input type="checkbox"/>	698	806	MHz	1000	W
<input type="checkbox"/>	806	901	MHz	500	W
<input type="checkbox"/>	806	824	MHz	500	W
<input type="checkbox"/>	824	849	MHz	500	W
<input type="checkbox"/>	851	866	MHz	500	W
<input type="checkbox"/>	869	894	MHz	500	W
<input type="checkbox"/>	896	901	MHz	500	W
<input type="checkbox"/>	901	902	MHz	7	W
<input type="checkbox"/>	929	932	MHz	3500	W
<input type="checkbox"/>	930	931	MHz	3500	W
<input type="checkbox"/>	931	932	MHz	3500	W
<input type="checkbox"/>	932	932.5	MHz	17	dBW
<input type="checkbox"/>	935	940	MHz	1000	W
<input type="checkbox"/>	940	941	MHz	3500	W
<input type="checkbox"/>	1670	1675	MHz	500	W
<input type="checkbox"/>	1710	1755	MHz	500	W
<input type="checkbox"/>	1850	1910	MHz	1640	W
<input type="checkbox"/>	1850	1990	MHz	1640	W
<input type="checkbox"/>	1930	1990	MHz	1640	W
<input type="checkbox"/>	1990	2025	MHz	500	W
<input type="checkbox"/>	2110	2200	MHz	500	W
<input type="checkbox"/>	2305	2360	MHz	2000	W
<input type="checkbox"/>	2305	2310	MHz	2000	W
<input type="checkbox"/>	2345	2360	MHz	2000	W
<input type="checkbox"/>	2496	2690	MHz	500	W

[Clone Prior ASN frequencies](#)

*Note: Selecting this link will only add frequency (ies)/power from the prior ASN listed in Structure Summary. Additional frequency (ies)/power must be manually added before submitting to the FAA if they are to be considered with your new filing.

I hereby certify that all of the above statements made by me are true, complete, and correct to the best of my knowledge. In addition, I agree to mark and/or light the structure in accordance with established marking and lighting standards as necessary.

[Save](#) [Cancel](#)



Federal Aviation Administration

- A. ***Sponsor:** Select the Sponsor from the dropdown menu. This menu is populated from your *My Sponsors* list. The registered information will automatically display in your electronic public record as the Sponsor's Representative once the case has been completed and a valid FAA Determination is issued.

- B. ***Notice Of:** Select the type of proposal. New Construction would be a structure that has not yet been built. Alteration is a change to an existing structure such as the addition of a side mounted antenna, a change to the marking and/or lighting, a change to power and/or frequency, or a change to the height. Existing would be a correction to the latitude and/or longitude, a correction to the existing height, or if filing for an existing structure that has never been studied by the FAA.

- C. ***Duration:** If Permanent, so indicate. If Temporary, enter the estimated length of time the temporary structure will be up in Months/Days.

- D. **Work Schedule:** *(Not a Required Field)* Using the calendar icons next to the fields select the date that construction is expected to start and the date that construction should be completed.

- E. **State Filing:** *(Not a Required Field)* Indicate if the case has been filed with the state.

- F. ***Structure Type:** Select the type of structure from the Structure Type drop down list. "Note: Frequencies will not be accepted if your Structure Type is 'Lighting Study'."

- G. ***Structure Name:** Enter a name for the structure (e.g. 50 Ton Crane, Hotel, Tower, etc...)

- H. **FCC Number:** *(Not a Required Field)* If this is an existing tower that has been registered with the FCC, enter the Antenna Structure Registration number.

- I. **Prior ASN:** *(Not a Required Field)* If an FAA aeronautical study was previously conducted, enter the prior Aeronautical Study Number.



Federal Aviation Administration

Prior ASN data can be pre-populated into the Notice of Proposed Construction or Alteration-Off Airport form data fields. When the e-filer confirms the Prior ASN data, the following data fields are available for pre-population:

- Latitude/Longitude
- Site Elevation
- Above Ground Level Height (determined AGL from valid prior ASN)
- Marking/Lighting (Recommended Marking /Lighting from valid prior ASN to requested Marking /Lighting)

J. ***Latitude/Longitude:** Latitude and Longitude must be precise geographic coordinates entered in Degrees, Minutes, and Seconds to the hundredth of a second (e.g. 25-47-4.75 N, 80-19-7.26 W).

K. ***Horizontal Datum:** Select either NAD83 or NAD27. North American Datum is a reference from which latitude/longitude measurements are made.

L. ***Site Elevation:** Enter the site elevation above mean sea level expressed in whole feet rounded to the nearest foot (e.g. 12' 3" should be entered as 12). This data should match the ground contour elevations for the site.

- **Add New Case (Off Airport) – Single e-file case entry:**
The OE/AAA system validates the Site Elevation (SE) of e-filer's entered location; if it passes the National Elevation Data (NED) terrain elevation validation check, the System takes the e-filer to the Map verify step. E-filers are alerted if the SE does not Pass the NED check. If this occurs, you must either adjust the SE or check the "SE comments provided in Additional Info" checkbox and provide SE comments in the Additional Info text box to explain the discrepancy.

- **Add New Case (Off Airport) - Additional Location(s) - Batch e-file entry:**
The OE/AAA system validates the SE entered on all Rows added when Save is selected; if they all pass the NED terrain elevation validation check, the system takes the e-filer back to the external e-Filing Form to certify their data entry and move to the Map verify step. The System validates all of the rows entered and alerts filers when the SE does not Pass the NED Data check for the location. If this occurs, you must either adjust the SE or check the "SE comments provided in Additional Info" checkbox and provide SE comments in the Additional Info text box to explain the discrepancy.



- M. * **Structure Height:** (AGL): Only for Structure Types that **ARE NOT** a **traverseway**. Your structure's height is the height above ground level in whole feet rounded to the next highest foot (e.g. 12' 3" should be entered as 13). The structure height includes anything mounted on top of the structure such as antennas, lightning rods, obstruction lights, etc.
- N. * **Unadjusted Structure Height:** (AGL): Only for Structure Types that **ARE** a **traverseway**. Your structure's height is the unadjusted structure height. Enter the unadjusted structure height above ground level in whole feet rounded to the next highest foot (e.g. 12' 3" should be entered as 13). The unadjusted structure height includes anything mounted on top of the structure such as antennas, lightning rods, obstruction lights, etc.
- O. * **Height Adjustment:**
Only for Structure Types that **ARE** a **traverseway**. The Unadjusted Structure Height AGL is adjusted upward by the system to account for the expected height of vehicles (or the highest mobile object [as applicable]) using the traverseway selected from the Structure Type drop down list in the Structure Summary section of the data entry screen.
- o For Structure Type "**Waterway**" and "**Other Traverseway**"
The Unadjusted Structure Height AGL is adjusted upward one (1) foot (default) by the system. **Enter the height** of the highest mobile object or vehicle expected to use the traverseway into the Height Adjustment field.
 - For Structure Type "**Private Road**"
The Unadjusted Structure Height AGL is adjusted upward ten (10) feet (default) by the system. **Enter the height** of the highest vehicle expected to use the traverseway into the Adjustment field.
- P. * **Total Structure Height** (AGL): Only for Structure Types that **ARE** a **traverseway**. The total of both the Unadjusted Structure Height and the Height Adjustment above ground level in whole feet rounded to the next highest foot (e.g. 12' 3" should be entered as 13).
- Q. * **Requested Marking and Lighting:** (Indicate the type Desired). The FAA Advisory Circular 70/7460-1 – Obstruction Marking and Lighting is recommended for determining the proper way to light and mark structures affecting navigable airspace. The AC can be accessed from the *Information*



Resources section of the website using the *Relevant Advisory Circulars* link.

Requested Marking/Lighting options:

- None
- Red lights
- Red lights and paint
- Red lights and flags
- Paint and 24-hour med-strobes
- Paint and a med-dual system
- Spherical markers and red lights
- Flag Marker
- Spherical Markers
- Dual-red and medium intensity
- Dual-red and high intensity white
- White-medium intensity
- White-high intensity
- White Paint/Synchronized Red Light
- White Paint Only
- Dual medium catenary
- Dual high catenary
- White-medium catenary
- White-high catenary
- Paint day, red flashing twilight & night
- Paint day, med-strobes twilight & night
- Paint day, hi-strobes twilight & night
- Other – (if selected from the dropdown, enter the marking/lighting type in the “Other” field)

R. **Aircraft Detection Lighting System” (ADLS):** *(Not a Required Field)* Control device to operate marking/lighting systems on structures.

S. ***Current Marking/Lighting:** Indicate the current M/L on the structure; if a new structure, select N/A Proposed Structure.

T. **Current AGL:** Required for structures being e-filed as existing or alteration.



- U. **Min Operating Height (AGL):** * For aeronautical study of a crane or construction equipment the maximum height should be listed above as the Structure Height (AGL). Additionally, provide the minimum operating height to avoid delays if impacts are identified that require negotiation to a reduced height. If the Structure Height and minimum operating height are the same enter the same value in both fields.
- V. ***Nearest City/State:** Enter the name of the nearest city and the actual state where the site will be located.
- W. ***Description of Location:** Enter a brief description of the actual location of the site including the address or the relationship of the structure to roads, airports, prominent terrain, existing structures, etc.
- X. ***Description of Proposal:** Enter a complete description that details the nature of the filing.
- Y. **Add new location:** When submitting more than one case (e.g. a crane and a building or four building points) the following required fields indicated with an asterisk (*) must be completed to successfully save additional locations: J, K, L, M, G, Q. Additional rows may be added in increments of 1 thru 5. To remove an additional row, select the Delete link.
- Z. **Proposed Frequency Bands:** *(Not a Required Field)* Check any that apply. "Note: Frequencies will not be accepted if your Structure Type is 'Lighting Study'."
- AA. **Specific Frequencies:** *(Not a Required Field)* any frequency band not listed in the Proposed Frequency Bands should be added here. Select the Add Specific Frequency link and enter the Low Frequency, High Frequency, Frequency Unit, Effective Radiated Power (ERP), and ERP Unit. Select [Save] or [Cancel] to be returned to the *Case Data Entry* page. If an e-filer intends to overlap protected FAA frequencies, specific coordination with the FAA Spectrum Engineering Group will be required. A textbox allows filers to submit rationale for the frequency overlap in the e-filed Notice of Proposed Construction or Alteration-Off Airport form. "Note: Frequencies will not be accepted if your Structure Type is 'Lighting Study'."



BB. **Clone Prior ASN frequencies** – (Not a Required Field) The Prior ASN field must be filled before entering frequencies. This link is displayed after the Specific Frequency Bands section. This link is only available if the e-filer adds a Prior ASN that has frequencies included in the case. When selected the applicable Proposed Frequency Bands and/or Specific Frequencies from the prior ASN auto populate and are available for edit by the e-filer prior to saving the draft. Once the e-filer saves this data, it becomes part of the current filing and is transmitted to the FAA with the new ASN. The e-filer is permitted to add additional frequencies if necessary after cloned frequencies are pre-populated but duplicate entries are not allowed. "Note: Frequencies will not be accepted if your Structure Type is 'Lighting Study'."

Selecting the **checkbox** to accept the certify statement.

When all required fields are completed, select the **[Save] button**. This will save the case data as a draft and take you to the *Project Summary* screen.

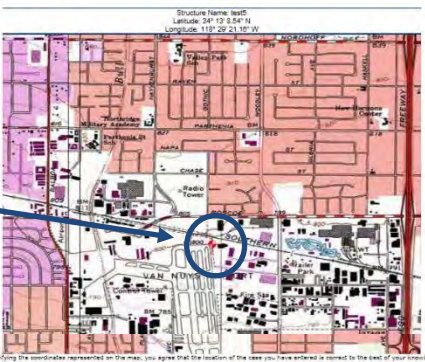
After case data has been saved as a draft, filers are taken to the Map Verification screen that displays all cases created on the previous Add New Case(s) Off Airport screen and require Map verification before submission.

Map Verification

Mapping - Desk Reference Guide

To submit your project to the FAA, you must verify the coordinates of each case listed below:
- Select the structure name link to verify for each case.
- Review the plotted location on the Map.
- Select Verify once you have confirmed the location or click on the structure name link to go back to the Structure Name and re-enter your entered coordinates.
NOTE: You may continue to the Project Summary page without verifying your maps, however, before your case is eligible for submission to the FAA you will be required to verify your plotted location. This function will also be available on the next screen for you to complete later.

Project Name:	City, State	Lat/Long	Sponsor:	Map
Structure				
test1 Draft	test, CA	34° 12' 8.84" N 118° 29' 21.10" W		View Map to verify
test2 Draft	test, CA	34° 12' 8.84" N 118° 29' 21.10" W		View Map to verify
test3 Draft	test, CA	34° 12' 8.84" N 118° 29' 21.10" W		View Map to verify
test4 Draft	test, CA	34° 12' 8.84" N 118° 29' 21.10" W		View Map to verify
test5 Draft	test, CA	34° 12' 8.84" N 118° 29' 21.10" W		View Map to verify



By verifying DR coordinates represented on the map, you agree that DR position of the case you have entered is correct to the best of your knowledge.

Aerial Photography Transparency Setting (1% increments)

Verify Map

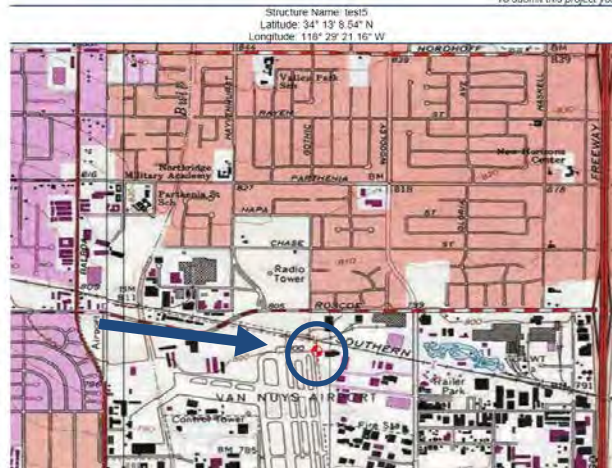
Continue - Map/Verify Later



Enlarged View

Structure	City, State	Lat/Long	Map
test1 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.20" W	View Map to verify
test2 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.19" W	View Map to verify
test3 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.18" W	View Map to verify
test4 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.17" W	View Map to verify
test5 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.16" W	View Map to verify

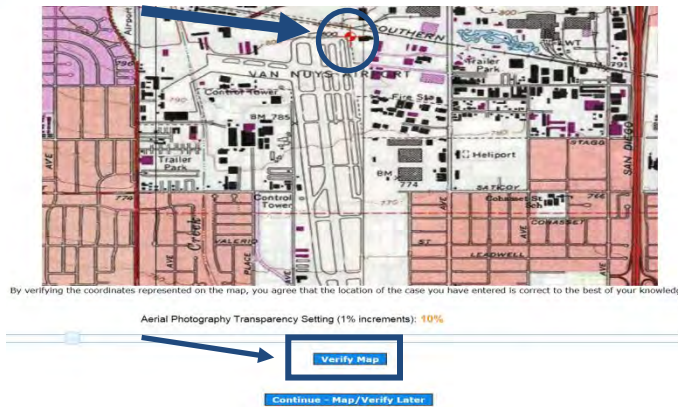
To submit this project you must verify the coordinates of each case listed above by verifying the map



- Select the link labeled **View Map to Verify** (displayed above the map) when more than one map needs to be verified or click the **Verify Map** button (displayed below the map) to view a single case map.
 - Review the plotted structure location on the Map (red bullseye) to verify the crosshairs on the map match with your proposed structure location.
 - Select **“Verify Map”** (at the bottom of the map) once you have confirmed the structure location. This will save the verified map but will NOT submit the case to the FAA.



Federal Aviation Administration



- It will return you to the Project Summary screen, where if needed, the **“Structure”** link is/are available to display saved draft(s) of the data form if entered case coordinates need to be revised.

NOTE: Once a map is verified, if the e-filer returns to the saved Off Airport data entry form draft and re-certifies and saves the form data, the filer is required to re-verify the map location prior to submission to the FAA.

Structure	City, State	Lat/Long	Map
test1 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.20" W	View Map to verify
test2 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.19" W	View Map to verify
test3 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.18" W	View Map to verify
test4 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.17" W	View Map to verify
test5 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.16" W	View Map to verify

To submit this project you must

Structure Name: test5
Latitude: 34° 13' 8.54" N
Longitude: 118° 29' 21.16" W

If the e-filer returns to the saved Off Airport data entry form draft [view data] but cancels (does not re-certify the entered data), they won't be required to re-verify the Map.

NOTE: You may continue to the Project Summary screen without verifying your map(s), however, before your case is eligible for submission to the FAA you will be required to verify your plotted location. This function will also be available on the next screen for you to complete later.



Federal Aviation Administration



When the only or last listed map in a project on the Map Verification screen is verified or if you continue to the Project Summary screen without verifying your map(s) the *Project Summary* screen will be displayed. Towards the right side of the page there will be a Map column and an Actions column. The Actions column contains the **Clone**, **Delete**, and **Upload a PDF** links. The Map column contains the **Verify Map** link.

Project Summary

Add Another Case to this Project Change the sponsor for this Project

Structure	City, State	Lat/Long	Map	Actions
test1 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.20" W	Show Map (Re-Verify)	Clone Delete Upload a PDF
test2 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.19" W	Verify Map	Clone Delete Upload a PDF

From the Project Summary page filers can verify or re-verify plotted location(s). To submit your project you must verify the coordinates of each case listed below by verifying the map".

To **verify** or re-verify your plotted map location from the Project Summary screen once you've confirmed the structure location; select the "**Verify Map**" or "**Re-Verify**" under the "Map" column header. On the map, click the "Verify Map" button at the bottom of the map or click on the "**Cancel**" button to return to Project Summary screen.



Federal Aviation Administration

Notice of Proposed Construction or Alteration - Off Airport

[Add a new Case Off Airport - Desk Reference Guide](#)

[Add a New Case Off Airport for Wind Turbines - Met Towers - Desk Reference Guide](#)

Project Name: _____ Sponsor: _____

Project Summary :

[Add Another Case to this Project](#) [Change the sponsor for this Project](#)

Structure	City, State	Lat/Long	Map	Actions
test1 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.20" W	Show Map (Re-Verify)	Clone Delete Upload a PDF
test2 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.19" W	Verify Map	Clone Delete Upload a PDF
test3 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.18" W	Verify Map	Clone Delete Upload a PDF
test4 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.17" W	Verify Map	Clone Delete Upload a PDF
test5 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.16" W	Verify Map	Clone Delete Upload a PDF

[Mapping - Desk Reference Guide](#)

[Attaching Documents - Desk Reference Guide](#)

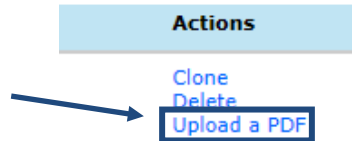


To submit this project, you must verify the coordinates for each case listed above.

[Upload a PDF to the Project](#)
Please upload all supporting case documentation including the latest certified survey, if available.



Attach Documents to Cases



For Off Airport cases you can upload PDF documents before and after submitting your case if needed.

Projects

One or more cases can be grouped into a Project. For example, each of the four building corner points can be a Case of a building Project. Project makes it easier to file, evaluate, manage, and approve related cases.

Project Summary

Add Another Case to this Project Change the sponsor for this Project

Structure	City, State	Lat/Long	Map	Actions
test1 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.20" W	Show Map (Re-Verify)	Clone Delete Upload a PDF
test2 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.19" W	Verify Map	Clone Delete Upload a PDF
test3 Draft	test, CA	34° 13' 8.54" N 118° 29' 21.18" W	Verify Map	Clone Delete Upload a PDF

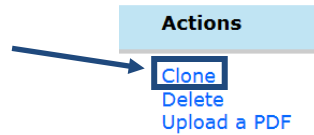
Add a Case



On the *Project Summary* screen you may select the **Add Another Case to this Project** link to add another case to this project. The cases entered this way will have the same project number.

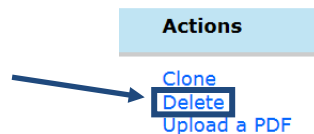


Clone a Case



Another way to add a case to the project is to clone a new case from an existing case. E-filers can clone cases from the Project Summary screen of cases in their account regardless of the status (i.e. Draft/Submitted). To clone a case, click the **Clone** link. The cloning feature will copy most of the information over into a new *Case Data Entry* screen and link the cases together in a project. You may add as many cloned cases to your project as necessary. Once all of the maps for the project have been verified, the **[Submit]** button will appear on the *Project Summary* screen so that the entire project can be submitted to the FAA.

Delete a Case



You may only delete cases in Draft status. To delete a single case or a case from a project, select the **Delete** link located under the Actions header on the Project Summary screen. This will display the *Confirm Case Deletion* screen. To continue with the delete, select the **[I Confirm]** button to execute the deletion.

Submit to FAA

Note: Before submitting your case/project to the FAA, determine if you need to use the Clone or Delete features.

After the case data has been saved and map(s) verified, the **[Submit]** button will appear on the *Project Summary* screen to allow you to submit the case to the FAA. If you have provided all the information about your case or project, select the **[Submit]** button. This will take you to the *Confirm Project Submission* screen.



Federal Aviation Administration

Project Name: _____ Sponsor: _____

Project Summary :
[Add Another Case to this Project](#) [Change the sponsor for this Project](#)

Structure	City, State	Lat/Long	Map	Actions
Test Draft	Ashburn, PA	40° 24' 40.80" N 79° 15' 32.92" W	Show Map (Re-Verify)	Clone Delete Upload a PDF

[Mapping - Desk Reference Guide](#) [Attaching Documents - Desk Reference Guide](#)

[Upload a PDF to the Project](#)
 Please upload all supporting case documentation including the latest certified survey, if available.

You may submit your Project to the FAA.

Select the **[I Confirm]** button to submit the case or project to the FAA. When the submission is done, OE/AAA will display the *Project Submission Success* screen.

Confirm Project Submission
 Project Name: _____

Please confirm you would like to submit Project _____ and associated cases to the FAA for processing.

The Aeronautical Study Number (ASN) assigned to your filed case(s) and other submission information is displayed. The Project Submission Success screen includes a link to a **state aviation contacts** map to determine if coordination of your proposed activity is necessary with your state aviation department.

Project Submission Success
 Project Name: _____

Project BRICK-00046811-19 has been submitted successfully to the FAA.
 Your filing is assigned Aeronautical Study Number (ASN)
 2025-AWP-8894-OE
 2025-AWP-8895-OE
 2025-AWP-8896-OE
 2025-AWP-8897-OE
 2025-AWP-8898-OE
 2025-AWP-8899-OE

Please refer to the assigned ASN on all future inquiries regarding this filing.
 Please return to the system at a later date for status updates.

It is the responsibility of each e-filer to exercise due diligence to determine if coordination of the proposed construction or alteration is necessary with their state aviation department. Please use the link below to contact your state aviation department to determine their requirements.
[State Aviation Contacts](#)

To ensure e-mail notifications are delivered to your inbox please add ninopy@faa.gov to your address book. Notifications sent from this address are system generated FAA e-mails and replies to this address will NOT be read or forwarded for review. Each system generated e-mail will contain specific FAA contact information in the text of the message.

Please return to the system at a later date for status updates.

Notice Criteria Tool

1. Visit our website at oeaaa.faa.gov.
2. Left side under Obstruction Evaluation, go down 17 and click on “Notice Criteria Tool.”
3. Enter the Latitude, Longitude, Horizontal Datum NAD-83, Site Elevation, and Structure Height.
4. Click on Submit.
5. The next page will show the results.
 - EX. 1 - “You do not exceed Notice Criteria” means notice to the FAA is not required.
 - EX. 2 - “You exceed Notice Criteria by 50 feet” means notice to the FAA is required. Stay on this website and electronically file notice.

ELECTRONICALLY FILED AERONAUTICAL STUDIES

1. Left side under OE/AAA Account click on “[New User Registration](#).”
2. Complete the “[New User Registration](#)” form and accept the Restriction of Liability Statement.
3. Click on “[Submit](#).”
4. Click on “[Continue](#).”
5. Click on “[Search](#).”
6. under the column “[Off Airport Construction](#)”, click on “[Add new Case \(Off Airport\)](#).”
7. Click on “[Add New Sponsor](#).” Please note that you may be both the sponsor and the representative.
8. Enter the Sponsor’s information.
9. Click on “[Submit](#).”
10. Page entitled “My Sponsors” will come up. If you need to add additional sponsors, click the blue “[Add New Sponsor](#).”
11. Left side click on “[Add New Case \(Off Airport\)](#).”
12. Enter all required information.
13. Click on “[Save](#).” If additional points are needed, scroll to bottom of page and click on “Add additional point” and enter all required information.
14. Page entitled “Notice of Proposed Construction or Alternation - Off Airport” will come up.
15. Click on the blue “[Verify Map](#)” that has a **red X** next to it.
16. A topo map will come up showing exactly where your coordinates plot. If the mark is not correct, click on “[Cancel](#)” and double-check your coordinates. If the mark is correct, click on “[Verify Map](#).”
17. Write down the “Project Summary” number, and then click on “[Submit](#).”
18. Click on “[I Confirm](#).”
19. Click on “[Return to Portal](#).”
20. Under the column “[Off Airport Construction](#)” click on “[Accepted](#).”
21. Page entitled “My Cases in ACCEPTED Status” will come up. Click on the blue [project name](#).
22. Page entitled “Notice of Proposed Construction or Alternation - Off Airport” will come up. Under Structure, you will see the aeronautical study number assigned to the case, i.e. 2009-ASW-1000-OE.
23. If you need to attach a PDF file to your study, under “Actions” click on “[Create Fax Cover/Upload a PDF](#)” and follow the step by step directions.

From: [Zach Golkowski \(MP\)](#)
To: [Kotch Egstad, Stacy \(DOT\)](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#)
Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Wednesday, April 23, 2025 7:11:12 AM
Attachments: [image002.png](#)
[image003.png](#)

Hi Stacy,

Thank you for this detailed response and specific information regarding MnDOT's participation in the permitting process. At this time, the ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We are currently requesting feedback from local, state, and federal agencies regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public. As we narrow down the Study Area and identify possible routes, we will plan to schedule the project introduction meeting with MnDOT and will be prepared to discuss the anticipated meeting topics listed below.

We look forward to working with you as the project develops.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Sent: Monday, April 21, 2025 7:49 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project



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attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Good Morning, ISA Project Team,

MnDOT welcomes you to host a project introduction meeting for the ISA Project with applicable agency staff. If you care to share a few dates/times with your project team availability when the information below is available, I will work to make a Microsoft Teams meeting happen on my end. Ideally, this meeting should occur at least 3 months prior to any RPA submission.

Anticipated meeting topics would be:

1. Scope of work
2. Project timeline
3. Available:
 - a. GIS/Non-GIS mapping
 - b. Structure typicals with dimensions
 - c. Workspace typicals
4. Anticipated effects on the state trunk highway system (colocation/access/utility permits required – TH 65, TH 73, TH 33, US 2)
5. Other state/federal agency coordination to-date
6. An overview of MnDOT's early coordination expectations (Utility Early Notification Memo process) – by MnDOT staff

Please see the link in my signature below, specifically the MnDOT Utility Project Guidance for Large Energy Facility Project Proposals document, for insight on MnDOT's expected coordination for your project proposal. Because MnDOT fully participates in the MN PUC permitting process, we require certain early coordination efforts to occur in order to provide substantive comments to the PUC docket and to ensure a successful downstream permitting process.

If this offer is of interest to you, please let me know at your earliest convenience.

Thank you for contacting MnDOT to begin early coordination on this Project,

Stacy Kotch Egstad

Utility Routing & Siting Coordinator | Office of Land Management

Minnesota Department of Transportation

395 John Ireland Blvd Mailstop 678

St. Paul, MN. 55155

651-358-0786

[Large Energy Facility Project Guidance - MnDOT \(state.mn.us\)](#)



From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 7:18 PM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Stacy Kotch Egstad:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust
612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



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866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Stacy Kotch Egstad
Minnesota Department of Transportation
Utility Routing and Siting Coordinator
395 John Ireland Blvd
Mailstop 630
St. Paul, MN 55155
stacy.kotch@state.mn.us

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Stacy Kotch Egstad:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that

April 18, 2025

Page 2

will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission's approval process.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

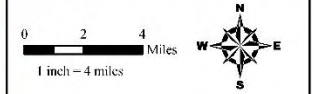
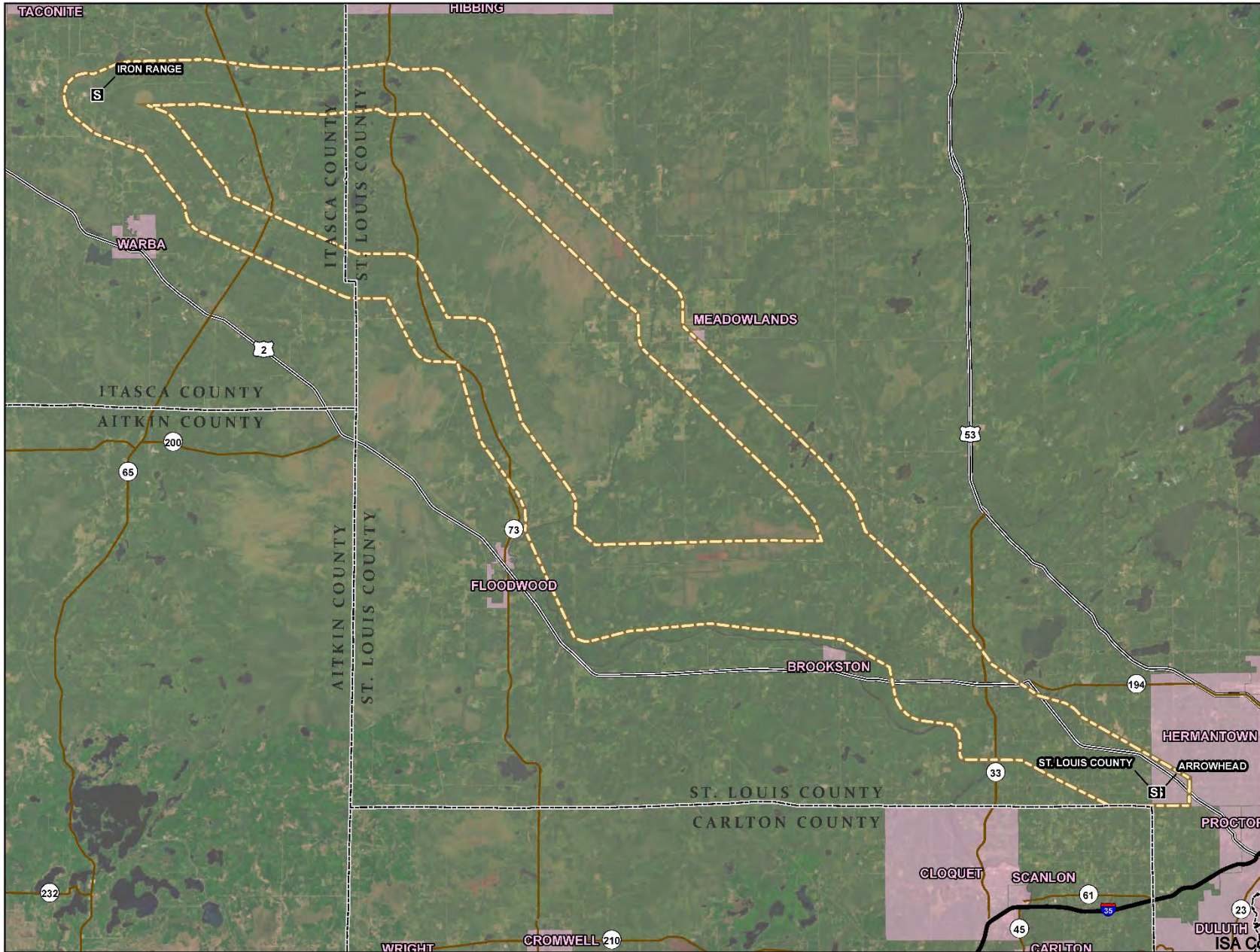
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 96 of 248

MnDOT Utility Project Review Guidance

FOR LARGE ENERGY PROJECT PROPOSALS
MINNESOTA DEPARTMENT OF TRANSPORTATION

Table of Contents

Introduction.....	1
Stages of Correspondence.....	1
Stage 1: Pre-MPUC Filing.....	1
Meeting	2
Early Notification Memo/Supplemental Checklist/Desktop Review.....	2
Stage 2: Post-MPUC Filing	4
Stage 3: Downstream MnDOT Permits.....	4
Stage 4: Construction and Post-Construction	4
Mapping.....	4
Overview Mapping and Digital Data.....	4
Detailed Mapping (Stage 1: MnDOT ENM Reviews)	5
Detailed Mapping (Stage 3: MnDOT Utility Permit Applications)	5
Typical Drawings.....	6
Pole Typical (Transmission Lines)	6
Buried Work Typical (including Construction Workspace Dimensions).....	6
ROW Access Typical (Stage 3, only).....	7
MnDOT Policies & References.....	7

Appendices

- Appendix A: Early Notification Memo and Supplemental Information Checklist
- Appendix B: Mapping Examples
- Appendix C: Typical Drawing Examples

List of Acronyms

CN	Certificate of Need
DOC-EERA	Department of Commerce-Energy Environmental Review and Analysis (DOC-EERA)
ENM	Early Notification Memo
GIS	geographic information systems
GSOC	Gopher State One-Call
HDD	Horizontal Direction Drill
HVTL	High Voltage Transmission Line
MA	Minor Alteration
MnDOT	Minnesota Department of Transportation
MPUC	Minnesota Public Utilities Commission
OES	Office of Environmental Stewardship
OLM	Office of Land Management
ROW	right(s)-of-way
RP	Route Permit
SP	Site Permit

Introduction

The Minnesota Department of Transportation (MnDOT) has developed this guidance document to assist Large Energy Project¹ proposers in providing adequate information, specific to MnDOT needs, during various stages of project development. This guidance specifically applies to projects that require a Certificate of Need, Route Permit, Site Permit, or Minor Alteration (CN, RP, SP, MA) from the Minnesota Public Utilities Commission (MPUC).

MnDOT prepared this guidance to inform project proposers about MnDOT's environmental review and permitting process, and to detail the needs of multiple MnDOT offices at various project stages. Following this guidance will help MnDOT staff evaluate proposed plans for any utility type and to respond and provide comments to the project proposer with the most accurate information possible.

MnDOT strongly encourages *early* engagement to identify areas of concern during project planning and routing (well in advance of applying for a RP/SP/MA with the MPUC). Early engagement is beneficial for identifying sensitive resources, planned MnDOT projects in the area that may conflict with the project, understanding utility permitting requirements, and to establish constructive communication with MnDOT through permitting, construction, and post-construction activities. This line of communication will help to ensure project impacts may be avoided, minimized, or mitigated.

Stages of Correspondence

MnDOT encourages correspondence with project proposers at multiple stages throughout the life cycle of a project. The level of detail and specificity MnDOT can provide during each of the following project stages is directly related to the quality and preciseness of information provided by the project proposer. MnDOT understands that project details generally become more refined throughout project development, and that project proposers, the public, or other stakeholders may introduce alternative routes or route segments for consideration. Following early engagement, we request the project proponents keep MnDOT apprised of major changes to scope and schedule throughout the course of the project, particularly those that may result in changes to utility crossings or collocation with MnDOT right-of-way (ROW).

Stage 1: Pre-MPUC Filing

During route or site development, the project proposer should engage in early consultation with MnDOT's Utility Routing & Siting Coordinator when the project is likely to affect the state trunk highway system² (crossing,

¹ High Voltage Transmission/Gen-Tie Lines, pipelines, solar farms, wind farms, and power plants of a specific size and type that require authorization from the MPUC.

² Trunk Highway System = All roads established or to be established under the provisions of Article XIV, Section 2 of the Constitution of the State of Minnesota. This system includes highways that are constructed, improved, and maintained as public highways under the jurisdiction of the Commissioner of Transportation, including highways on the Interstate system.

collocated or access). Early coordination will assist project developers in identifying MnDOT concerns early in the process and to address these issues well in advance of construction.

Meeting

We recommend project proposers initiate early consultation by requesting an in-person/virtual meeting with MnDOT **at least 3 months** ahead of filing an application for a RP/SP/MA with the MPUC. Expected MnDOT meeting attendees include staff from the Office of Land Management (OLM), Office of Environmental Stewardship (OES), and District permitting and planning staff. Please refer to <https://dot.state.mn.us/utility/contacts.html> for current Utility Permits staff to contact to set up this initial meeting.

Project introduction meetings can be high-level, but at a minimum, project proposers should be prepared to discuss the following:

- Project purpose and need
- Project schedule
- Proposed routes/alternatives (or study areas/corridors) and/or site locations
- Summary of public outreach conducted to date and any substantive issues that have been identified
- Identification of MnDOT trunk highway and Scenic Byways³ that may be affected (crossed and/or collocated)⁴

NOTE: *Project proposers are expected to take meeting minutes and distribute to meeting attendees within 3 business days of the meeting for review/approval. Meeting minutes and subsequent communication/emails with MnDOT staff should be catalogued and filed with the project proposer’s application to the MPUC.*

Early Notification Memo/Supplemental Checklist/Desktop Review

Following this project introduction meeting, MnDOT will request the project proposer complete an “Early Notification Memo” (ENM) and supplemental checklist (see section below for more information). If the project scope and location is very broad at this stage, MnDOT may recommend delaying the completion of the ENM until more refined route(s) are available. Applicable MnDOT OLM, OES, District, and other staff will review the provided information and, depending on the MPUC filing stage, submit comments back to the project proposer or directly into the coordinating MPUC docket. MnDOT requires a minimum of 30 days to complete review of the ENM and supplemental information.

NOTE: *MnDOT requests its response be included in the project proposer’s application to the MPUC, and that outstanding issues or concerns are addressed either in a direct response to MnDOT, within any MPUC applications, in reply comments to the MPUC, or as early as possible during the MPUC permitting process.*

³ Note – not all Scenic Byways are state trunk highway.

⁴ Please utilize MnDOT’s [Right of Way Mapping and Monitoring](#) application to assist in identifying trunk highway.

Utility Early Notification Memo Form

MnDOT has created an ENM form to aid project proposers in identifying and providing information on areas of potential project-specific impacts that are relevant to our agency and require additional review (see Appendix A). The ENM requests a wide range of information from project proposers including information on biological resources (e.g., vegetation, protected species, wetlands and waterbodies, floodplains, etc.), cultural resources, contaminated and hazardous sites, scenic byways, railroads, airports, and more. If the proposed project has the potential to impact any of these resources, MnDOT subject matter experts will review the project and provide comment.

At this early stage of project planning, MnDOT assumes most of the information needed to complete the ENM will be identified via a comprehensive review of publicly available geographic information system (GIS) shapefiles and databases. However, if the project proposer has conducted field surveys and/or consultation with other agencies, the project proposer should also provide this information.

Please allow **at least 30 days** (upon receipt of a completed ENM form/supplemental package) for MnDOT staff to complete its review and provide comment. MnDOT anticipates its response to the ENM will be filed with the project proposer's MPUC application as part of an Agency Correspondence appendix. As such, MnDOT also recommends project proponents budget ample time in their project schedule to review and address MnDOT comments in its MPUC application. Addressing these issues proactively will help to alleviate future issues in downstream permitting.

Utility Early Notification Memo Supplemental Information Checklist

MnDOT has developed a Supplemental Information Checklist to be completed in tandem with the ENM Form described above. The Supplemental Information Checklist details GIS, non-GIS, mapping, and other required information needed for MnDOT to review large energy project proposals properly and efficiently.

Project proposers should complete the Supplemental Information Checklist with the ENM, and the supplemental materials provided as attachments (recommend as a consolidated, bookmarked .pdf file). MnDOT does not have a designated template for how this information is presented; however, project proposers should present the material in an orderly and logical format. If any of the requested material in the checklist is not available or complete at the time of submittal, please note it and provide anticipated date(s) when the item(s) will be completed/available.

Utility Early Notification Memo and Desktop Review

Upon receipt of a completed ENM Form and Supplemental Information Checklist, MnDOT's OLM and OES will initiate their review of the project. OES staff will review project shapefiles and mapping products using its internal GIS mapping viewers and databases (which includes information not available to the general public). During this review period, MnDOT staff may contact project proposers for additional information or clarification. To maintain MnDOT's 30-day review window, MnDOT requests prompt responses to any follow-up data requests.

Stage 2: Post-MPUC Filing

MnDOT participates in the MPUC permitting process and will base its scoping and environmental reviews on the information provided in the pre-filing process and applicable project docket. MnDOT has a statutory responsibility to participate in the MPUC permitting process and may respond to requests for public comment throughout this phase as they apply to state trunk highway ROW and applicable agency downstream permitting.

Project proponents are encouraged to maintain contact with MnDOT throughout this phase, particularly if there are unresolved issues or commitments that arose from the Stage 1 (Pre-Filing) phase and/or if substantial changes to the project scope arise. We encourage project proposers to directly address outstanding MnDOT concerns and issues on the public record so MnDOT and MPUC/DOC-EERA staff can continue coordination as needed and allowed.

Stage 3: Downstream MnDOT Permits

When applicable, MnDOT is responsible for issuing “downstream” permits *after* a project proposer receives their MPUC RP, SP or MA. This is commonly required where any part of a proposed project intersects with the state trunk highway system.

Close coordination with MnDOT District staff when preparing, submitting, and performing work for MnDOT permits is strongly encouraged. For cross-reference and simplification purposes, project proposers need to provide their MPUC docket numbers on all MnDOT utility permit applications. Project proposers need to closely follow MnDOT Utility Application instructions found here: [MnDOT Utility Agreements & Permits](#). In particular, project proposers need to carefully submit detailed maps as described in the Mapping section of this guidance document (please refer to example maps Appendix B).

Stage 4: Construction and Post-Construction

MnDOT reserves the right to conduct site inspections, at any phase, as it applies to MnDOT property and interests. In addition to Certificate of Completions that must be signed off by MnDOT Assistant District Engineers, other MnDOT offices may elect to conduct their own inspections to confirm compliance with applicable MPUC permit conditions and MnDOT special provisions. In addition, MnDOT requests copies of all DOC-EERA Third-Party Monitor reports be submitted to its Utility Routing & Siting Coordinator [refer to: [Contacts - Utility Agreements & Permits - MnDOT \(state.mn.us\)](#)] during construction.

Mapping

Overview Mapping and Digital Data

MnDOT requests digital project data (e.g., shapefile, .kmz, and/or .kml files) displaying pertinent project details be provided during Stage 1 (Pre-MPUC filing) and Stage 3 (Downstream Permits). If there are substantial changes

to the project scope/location between Stages 1 and 3 (MPUC permitting), MnDOT may request updated shapefiles and mapping be provided. Project proposers will name shapefiles and maps logically (e.g., Rev 1, 2, 3, etc., or provide date in file name) to avoid confusion when subsequent revisions are released.

MnDOT also requests that project proposers provide overview maps (.pdf format). Overview maps must be scaled appropriately to ensure all project components fit on one page. At a minimum, overview maps need to include the following:⁵

- Overall land use (if appropriate to scale)
- Township, Range, and Sections⁶
- Affected Minnesota trunk highways (including U.S. and Interstate)
- Route width, alternatives, study areas/corridors, and alignments clearly marked
- Cities and towns
- Major named waterbodies
- Scenic Byways
- Federal, Indian, State, and County/Municipal-owned or managed lands

Detailed Mapping (Stage 1: MnDOT ENM Reviews)

As part of its Utility ENM Supplemental Information Checklist (see Appendix A), MnDOT has identified detailed mapping products that the Project Proposer must provide in addition to project information in GIS format (e.g., shapefiles, .kmzs, .kmls). Please provide overview maps displaying the entire project; however, focus detailed mapping only for portions of the project that directly cross or are collocated with MnDOT trunk highways. If you have specific questions or would like to request example maps, please reach out to MnDOT's Utility Routing & Siting Coordinator [refer to: [Contacts - Utility Agreements & Permits - MnDOT \(state.mn.us\)](#)].

Detailed Mapping (Stage 3: MnDOT Utility Permit Applications)

MnDOT's ROW maps must be used to show proposed work. These required maps can be found here: <http://www.dot.state.mn.us/maps/gisweb/row/>. There are several ROW and reference layer options to toggle on and off as needed.

NOTE: Please do not rely on the "Approximate Right of Way Line" layer on the viewer. When zoomed in, the user will be able to view the "ROW Footprints" layers (fuchsia or purple polygon). When clicking on a ROW Footprint polygon, the user will be able to download a .pdf of the actual ROW map for the highway segment (see example maps in Appendix B). If there is more than one map option in the area, larger numbered maps are typically newer versions. If you are unsure about what map to use, please contact the appropriate MnDOT Utility Permit staff found here: [MnDOT Utility Agreements & Permits Contacts](#)

⁵ If proper scaling prevents all items to be shown on the overview map, please display these on the detailed mapsets.

⁶ For very large projects, it may not be feasible to display section level data.

Maps provided in MnDOT utility permit applications must be in .pdf format and include the following:

- Cross-sections of each proposed crossing of or collocation with the trunk highway system.
- MnDOT ROW limits clearly shown.
- You may submit additional maps/plan & profiles as shown in Appendix B (Example #2). MnDOT works with highway stationing and not mileposts or latitude/longitude. Stationing is shown on ROW maps.
- Proposed work drawn to a scale of no smaller than 1 inch = 200 feet.
- Utilities are expected to be located as close to the MnDOT ROW line as possible (typically within the outer 5 feet) unless this area is a ditch bottom or there is existing above/below ground infrastructure where collocation is not feasible.
- All other utilities within the work area must be shown on the mapping. Utility locates should be done as soon as possible through [Gopher State One Call: Dig Safely with Free Locate Requests \(GSOC\)](#). See Appendix B, Example 2.

Typical Drawings

In addition to mapping products displaying alignment of project features, MnDOT requests project proponents provide typical drawings to display workspace dimensions, road crossings, and vertical impacts (above and below ground). The following is a list of typical drawings that MnDOT requests be submitted during Stage 1 and Stage 3. Please refer to Appendix C for examples of acceptable typical drawings.

Pole Typical (Transmission Lines)

For transmission lines, please provide a drawing displaying a typical utility pole, including the following features (show in relation to trunk highway ROW, if applicable):

- Minimum/maximum height
- Diameter of pole at ground level
- Ground occupation width and depth of pilings
- Maximum davit arm width
- Easement or utility ROW dimensions

Buried Work Typical (including Construction Workspace Dimensions)

For buried work (e.g., pipelines, cables/fiber, etc.), include the following features (show in relation to trunk highway ROW, if applicable):

- Temporary workspace and permanent easement dimensions
- Profile/depth of excavation
- Road crossing typical drawings showing extra temporary workspaces
- Bore/Horizontal Direction Drill (HDD) typical drawings (if HDD proposed)
- Pipe Diameter
- Soil/subsoil segregation

In addition, the following specific information will be needed to be displayed on maps included with the MnDOT Utility Permit Applications (described in Stage 3, above):

- Highway centerline and ROW line
- Proposed and existing utilities
- Bore and/or handhole location
- Access road location(s), if applicable

ROW Access Typical (Stage 3, only)

Access from MnDOT ROW, whether existing or new points of access, is not guaranteed. In either case, new temporary or permanent highway access permits are required.

For a private, single-family dwelling or field access, include one (1) drawing showing the location of the proposed access in relation to your property lines and proposed buildings, adjacent roads, and landmarks. Show all dimensions and, if possible, draw to scale.

For a commercial, industrial, or multiple dwelling access, include one (1) copy of the site/plot plan, and grading and drainage plan. Show parcel layout, proposed lots, dimensions, directions, building locations and sizes, parking plans, internal circulation plans, street layouts, etc. Show all dimensions drawn to scale.

MnDOT Policies & References

The following resources are available to assist project proposers in statute, policy, and rule expectations. If you have any questions or need more information, please reach out to the MnDOT Utility Routing & Siting Coordinator [refer to: [Contacts - Utility Agreements & Permits - MnDOT \(state.mn.us\)](#)]

[MnDOT Utility Agreements & Permits Page](#) (the links below are also found on this page)

[MnDOT Utility Accommodation Policy \(PDF\)](#)

[MnDOT Utility Accommodation and Coordination Manual](#)

[MnDOT Right of Way Mapping and Monitoring](#)

[MnDOT Permit Environmental Requirements](#)

[Transmission Line Guidelines](#)

[MnDOT Online Permit Application System](#)

[MnDOT Utility Permit Special Provisions List](#)

Appendix A

Early Notification Memo and Supplemental Information Checklist

MnDOT Utility ENM Form

A tailored version of the Utility ENM Form will be provided to project proposers upon early coordination engagement with MnDOT. Contact MnDOT's Utility Routing & Siting Coordinator for assistance.

Content request highlights include:

- Project description including MPUC docket number(s)
- Project schedules (e.g., permitting, construction, and in-service dates)
- Specific information by subject/resource area including:
 - Environmental resources
 - Protected species
 - Vegetation
 - Wetlands and waterbodies
 - Cultural resources
 - Contaminated sites and regulated waste
 - Construction stormwater
 - MnDOT resources
 - Scenic Byways
 - Rest Areas
 - Historic Roadsides
 - Railways and airports
- Specifics of how and where the project intersects with the state's trunk highway system
- Specifics of temporary workspaces and permanent utility placement affecting trunk highway ROW

Utility ENM – Supplemental Information Checklist¹

- Applicant(s):** [Click or tap here to enter text.](#)
- Type of Project:** [Choose an item.](#)
- Number of Miles (total project):** [Click or tap here to enter text.](#)
- Number of Miles (collocated with MnDOT ROW):** [Click or tap here to enter text.](#)
- MnDOT Trunk Highway Potentially Impacted** [Click or tap here to enter text.](#)

****NOTE to Project Proposers: Please provide the following supplemental information, which is required for MnDOT staff to initiate review of utility projects.****

GIS Details

- Shapefiles and .kml/.kmz's displaying the following Project features (include associated metadata and date of last project/route revision):
 - Project Centerline²
 - Alternative Route(s)²
 - Route/Corridor Width (Construction), if known³
 - Study Area, if applicable³
 - Additional non-corridor Project details (e.g., substations, compressor stations, valves, staging areas, pipe yards, proposed and/or existing access roads, etc. (if known at time of submittal))
- Overview map (.pdf format) displaying Project centerline and alternatives (if applicable) with MnDOT Trunk highway and major features identified. Display full project on one page. Locations of MnDOT Trunk highway can be accessed [here](#).
 - Identify locations of detailed maps (see below) on the overview map, and label sequentially for easy identification (e.g., 1, 2, 3 / A, B, C, etc.)
 - Base layers to include:
 - Cities
 - Counties
 - MnDOT trunk highway
 - [Scenic Byways](#) (within 7-mile buffer)⁴
 - Major rivers and waterbodies
 - National and state-owned or managed lands

¹ Current as of January 2024. Please confirm with MnDOT OLM this checklist is the most current version before submitting your ENM response.

² Include as polyline.

³ Includes as polygon. May be a buffered corridor based off the project centerline.

⁴ Note that not all scenic byways are MnDOT trunk highways. Some are county highways.

- Detailed (zoomed in maps, aerial background, .pdf format) displaying Project details with MnDOT's trunk highway identified. Provide a separate map for each trunk highway crossing location /collocated segment. Display proposed and existing access locations on state trunk highway, if applicable. Indicate if proposed access locations are intended to be permanent or temporary.

NOTE: Detailed maps are only needed for portions of Project that intersect and/or are collocated with MnDOT trunk highway. Map extents should show a minimum of 0.5 mile surrounding the MnDOT trunk highway.

Please provide a separate map for each detailed map area for each of the following six major topics:

- Public Land Ownership (federal/state/county/tribal)
 - Protected Biological Resources
 - Designated Critical Habitat
 - Rusty Patch Bumble Bee High Potential Zones
 - Minnesota Department of Natural Resources Native Plant Communities
 - Minnesota Biological Survey (MBS) Railroad Rights-of-Way Prairies
 - MBS Sites of Biodiversity Significance
 - Water Resources and Hydrology
 - National Wetland Inventory (or field-delineated) wetlands
 - National Hydrography Dataset (NHD) waterbodies
 - Floodplains
 - Drinking Water Supply Management Areas
 - Minnesota Pollution Control Agency (MPCA)-designated [special waters and impaired waters](#) (with a construction related impairment, e.g., turbidity)
 - Potential Contaminated Sites: What's In My Neighborhood (WIMN) sites within 500-feet of MnDOT Trunk Highway at crossings or collocated areas.
 - MPCA WIMN sites: Multiple Programs, Investigation and Cleanup, and Tanks.
 - Minnesota Department of Agriculture WIMN sites: Small Spills and Investigations, Old Emergencies, Contingency Areas, and Incident Investigations.
 - SSURGO Soils Data (display all soils on map; highlight the following)
 - Highly erodible soils (water/wind)
 - Steep slopes (water/wind)
 - Scenic Byways
-
- Corresponding data tables for desktop GIS data.
 - Summary table(s) (Excel format) of publicly available GIS data displayed on the detailed maps (see above). Include easy-to-interpret geographic data (e.g., label IDs, latitudinal/longitudinal coordinates [DD]) and metadata for each feature so MnDOT staff can easily cross-reference to the feature on the map.
 - Reference list of sources of desktop GIS data displayed on maps. Include URL and date of last download.

Non-GIS Information

- Temporary workspace and permanent easement typical drawings (greenfield and collocated segments, as applicable). Include typical workspace configurations for road crossings, as applicable.
- Known occurrences of state- or county-listed noxious weeds (see [EDDMapS](#)) in the vicinity of the project. A current state list is available [here](#) and county lists are [here](#). We recommend consulting with the counties directly to verify their list is current.
- Narrative summary of environmental field surveys done to date. Provide an anticipated schedule for completion, if applicable.
 - Cultural Resources
 - Tribal Resources
 - Wetlands and Waterbodies
 - Protected Species / Habitat Assessments
 - Contaminated Materials (Phase I Environmental Site Assessments/Phase II)
 - Noxious/Invasive Weeds
 - Other (specify: _____)
- Summary of agency consultations/communications/public engagement done to date. If none, provide an anticipated schedule.
- Is permanent infrastructure expected to be installed within MnDOT's ROW? If so, provide details.
- Is travel across/along MnDOT's ROW anticipated? If so, provide details and anticipated Best Management Practices to be used (e.g., timber matting, erosion/sediment controls, etc.). Describe if any proposed access locations will be permanent or temporary.
- Project Schedule/Major Milestones (Minnesota Public Utilities Commission filing, construction/restoration, in-service date, etc.)
- Vegetation Management Plans
 - Provide existing vegetation management plans, or anticipated vegetation management strategies associated with the long-term maintenance of the corridor. Plans should describe methods, seasonality, frequency of maintenance activities (e.g., annual growing season broadcast herbicide treatments, brushing every five years during dormant season).

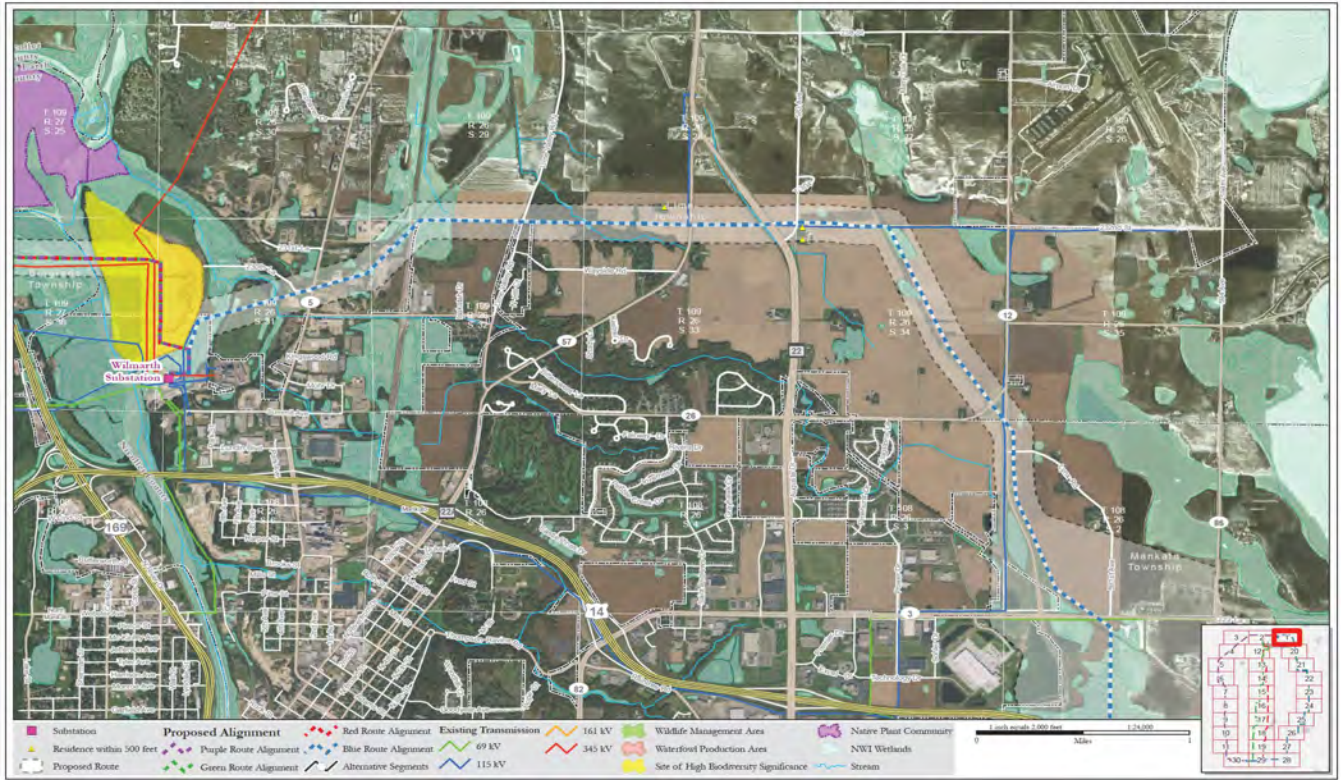
Other

- Powerlines:* Utility pole typical drawings (if collocated, include drawings of proposed poles in relation to existing)
 - Typical pole spacing lengths, typical pole type (e.g., H-frame, T-frame, etc.) and material
 - Typical pole footprint and depth
- Pipelines:*
 - Plan and profile typical drawings of workspace configurations showing depth of cover, width of workspaces, topsoil stripping, etc.
 - Pipe diameter and material

Appendix B

Mapping Examples

Overview Mapping Examples

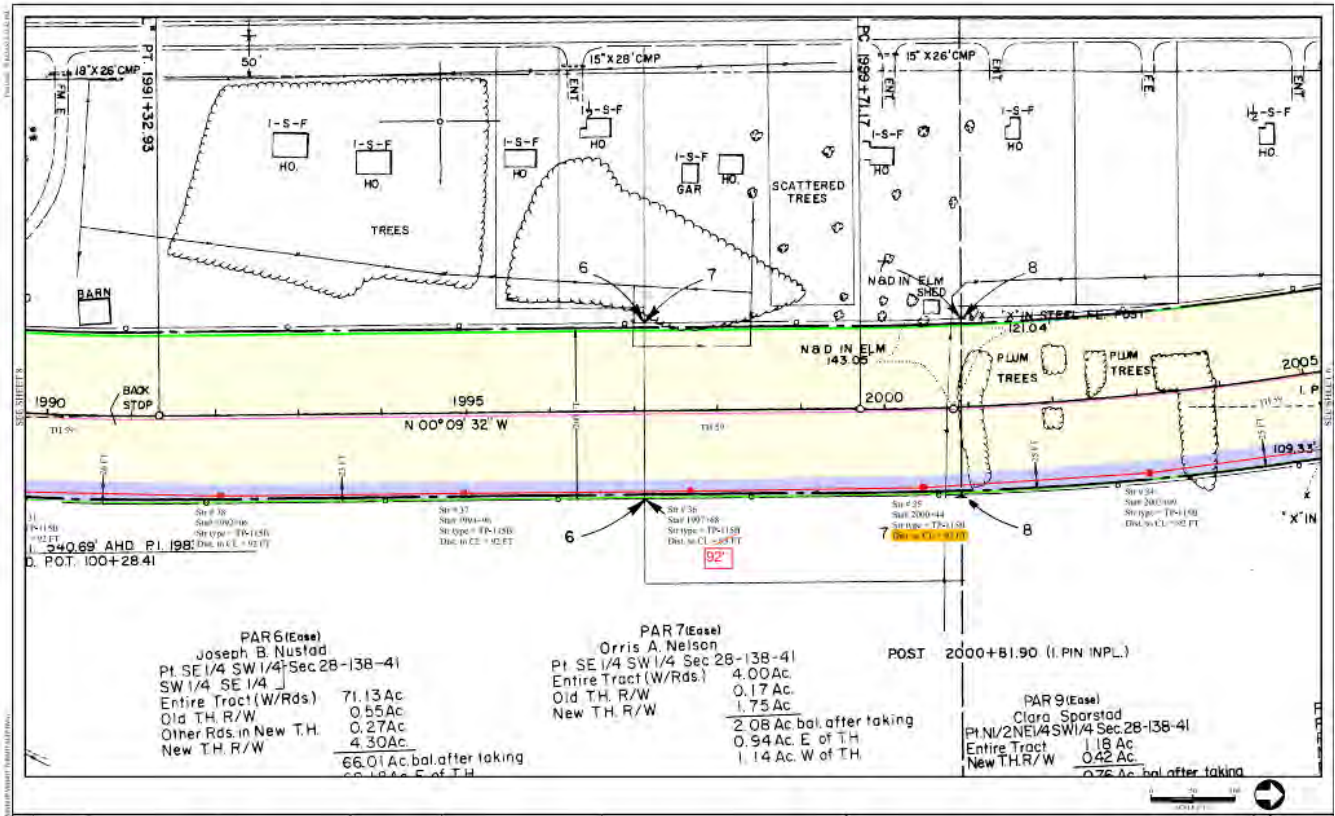


Stage 1 Project Area



Stage 3 Project Area

Detailed Mapping (Example 1)

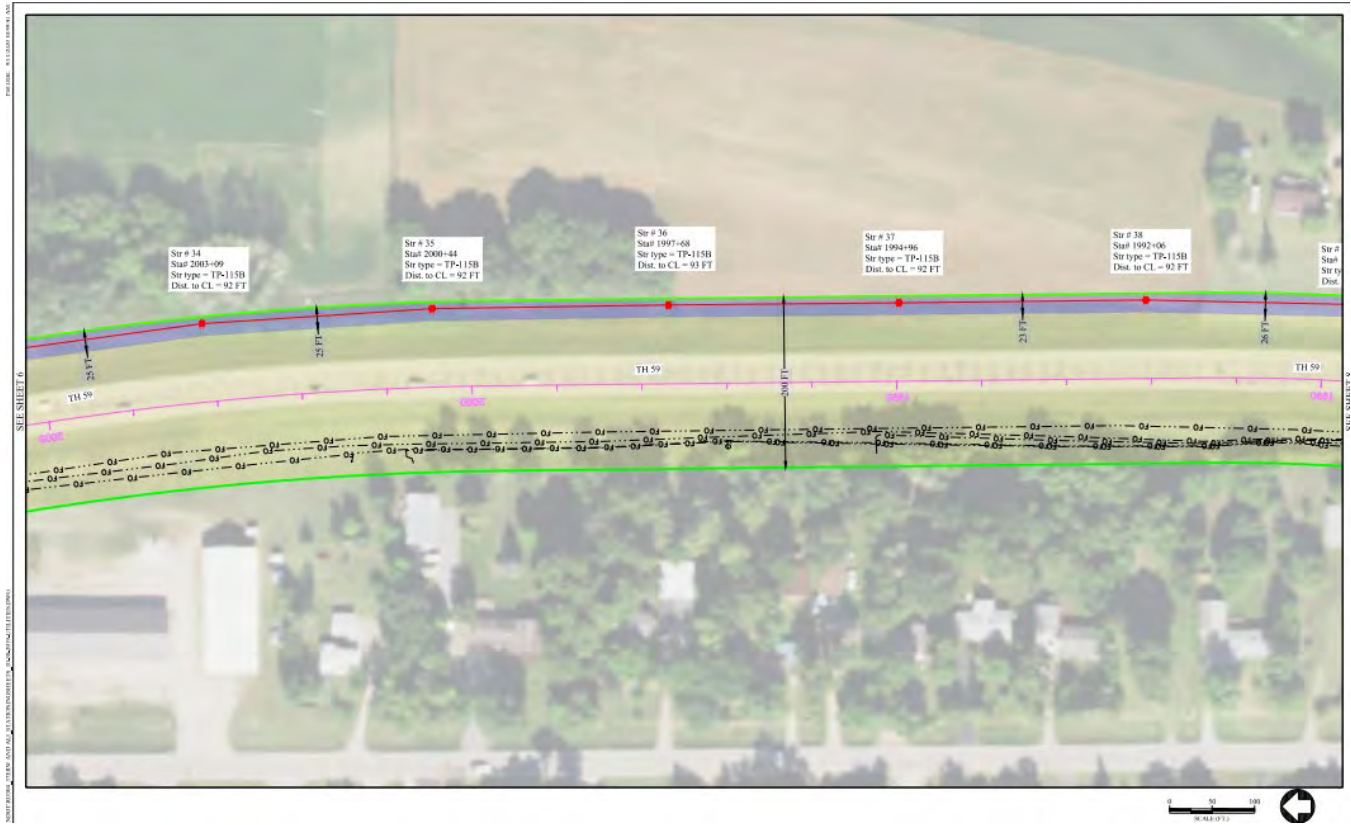


MNDOT ROW Map with HVTL Placement

- MNDOT ROW LIMITS
- HVTL ROW (NO EASEMENTS APPLY ON MNDOT ROW)
- HVTL CENTERLINE PLACEMENT
- HIGHWAY CENTERLINE

NOTE: ROW LINE OFFSET AND DISTANCE FROM POLE TO HIGHWAY CENTERLINE IS NOTED THROUGHOUT THE LENGTH OF THE LINE

Detailed Mapping (Example 2)



Aerial Map with HVTL Placement and Utility Locates

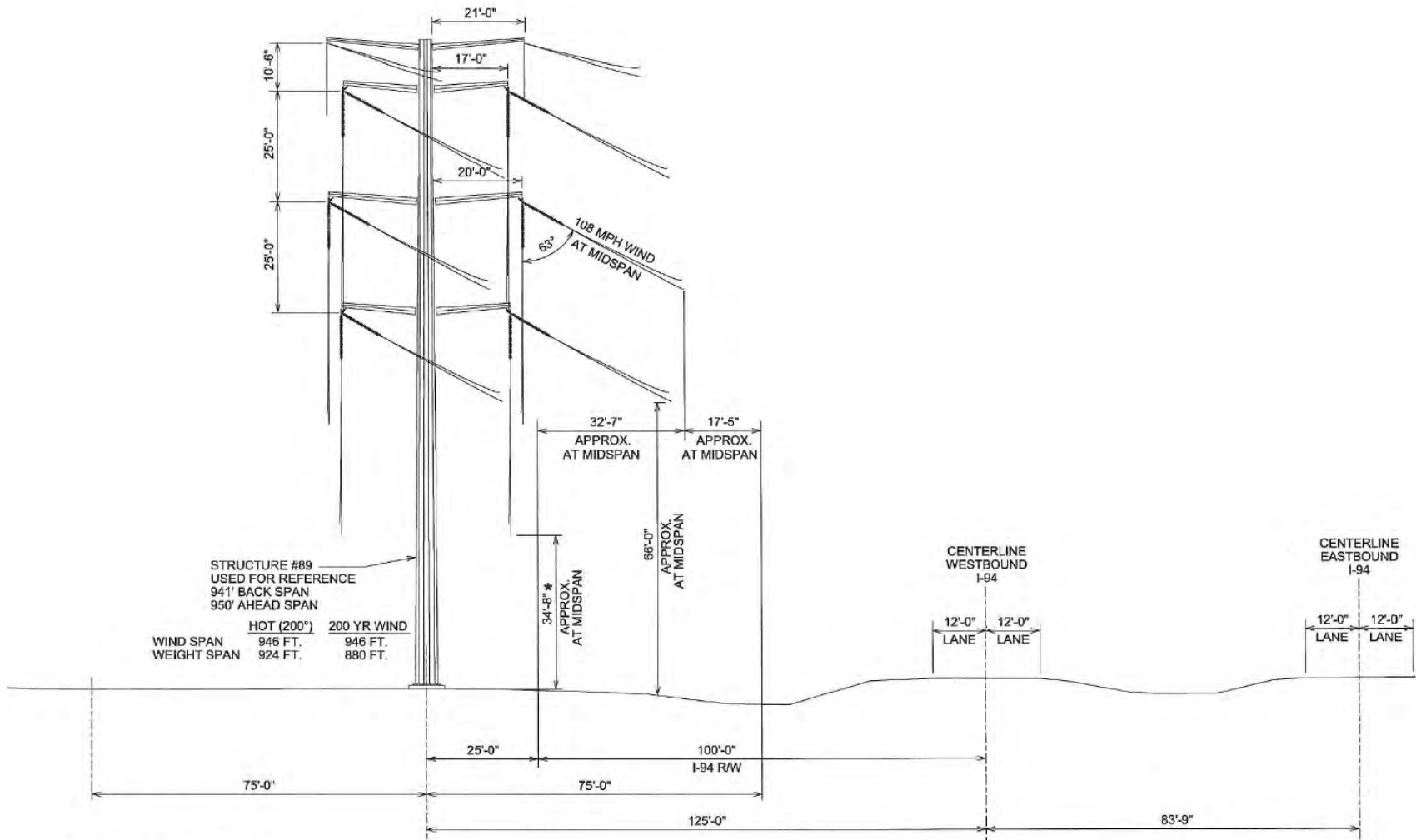
SAME AREA AS EXAMPLE 1 – FLIPPED AND SHOWING GSOC UTILITY LOCATES, ROW LIMITS, CENTERLINE AND MNDOT STATIONING

- MNDOT ROW LIMITS
- HVTL ROW (NO EASEMENTS APPLY ON MNDOT ROW)
- HVTL CENTERLINE PLACEMENT
- HIGHWAY CENTERLINE
- UTILITY LOCATE

Appendix C

Typical Drawing Examples

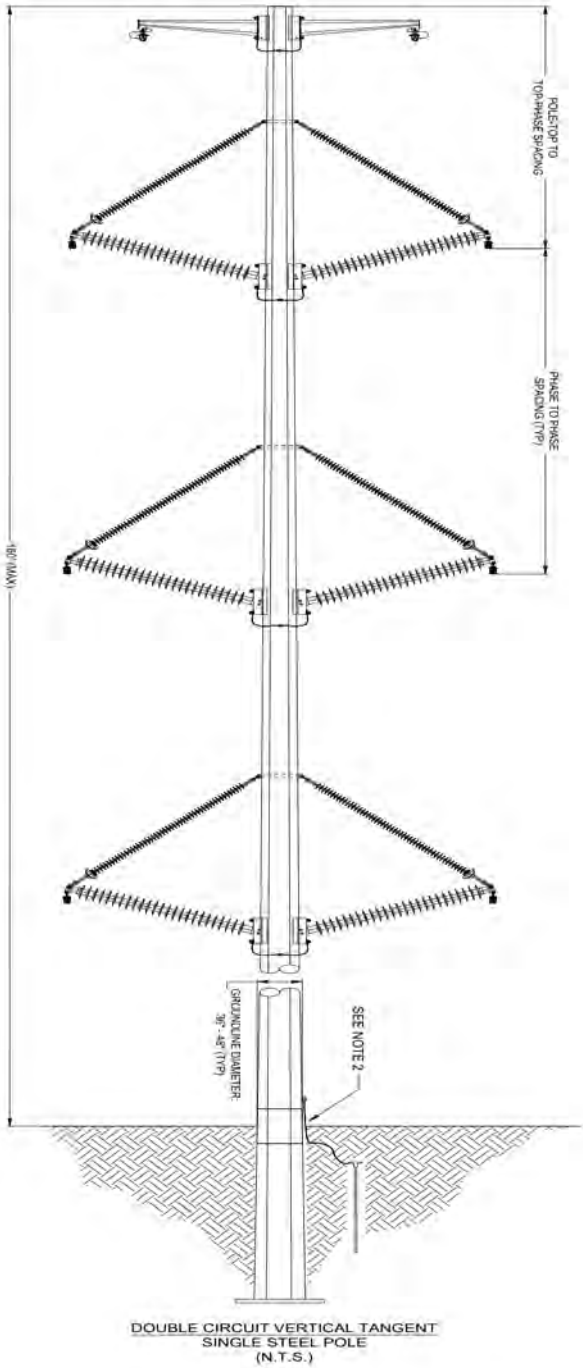
HVTL Pole Typical



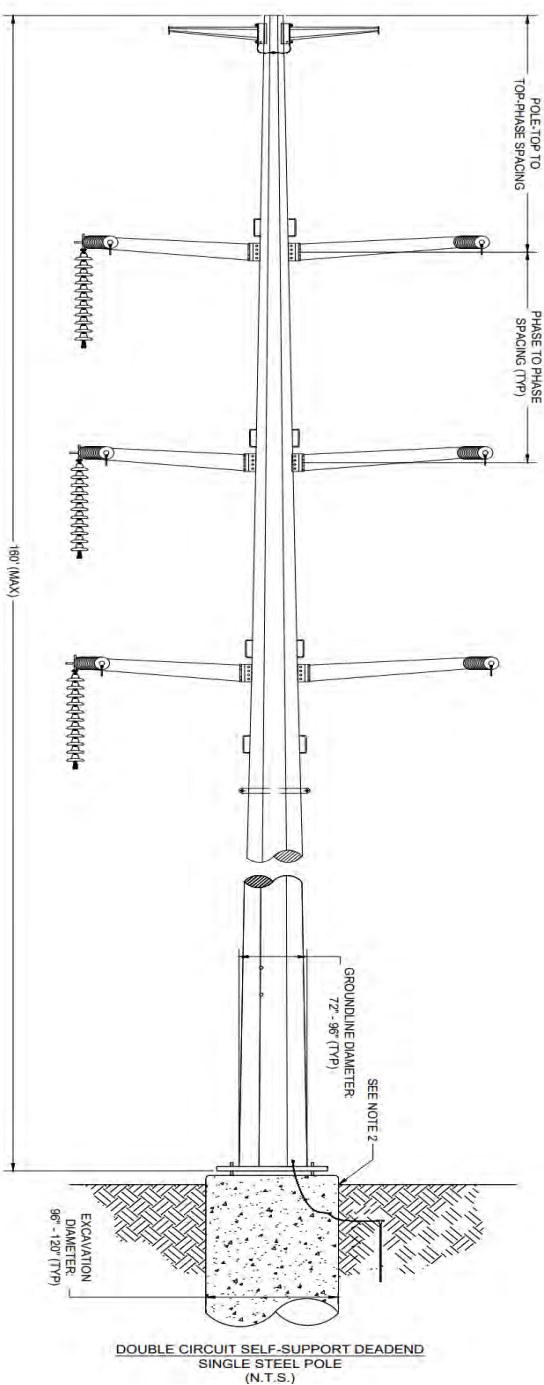
* 30'-0" MINIMUM GROUND CLEARANCE.
ACTUAL CLEARANCE WILL VARY BY SPAN.

Pole Placement and Conductor Movement Envelope (Blowout) in Relation to Road ROW

HVTL Pole Typicals

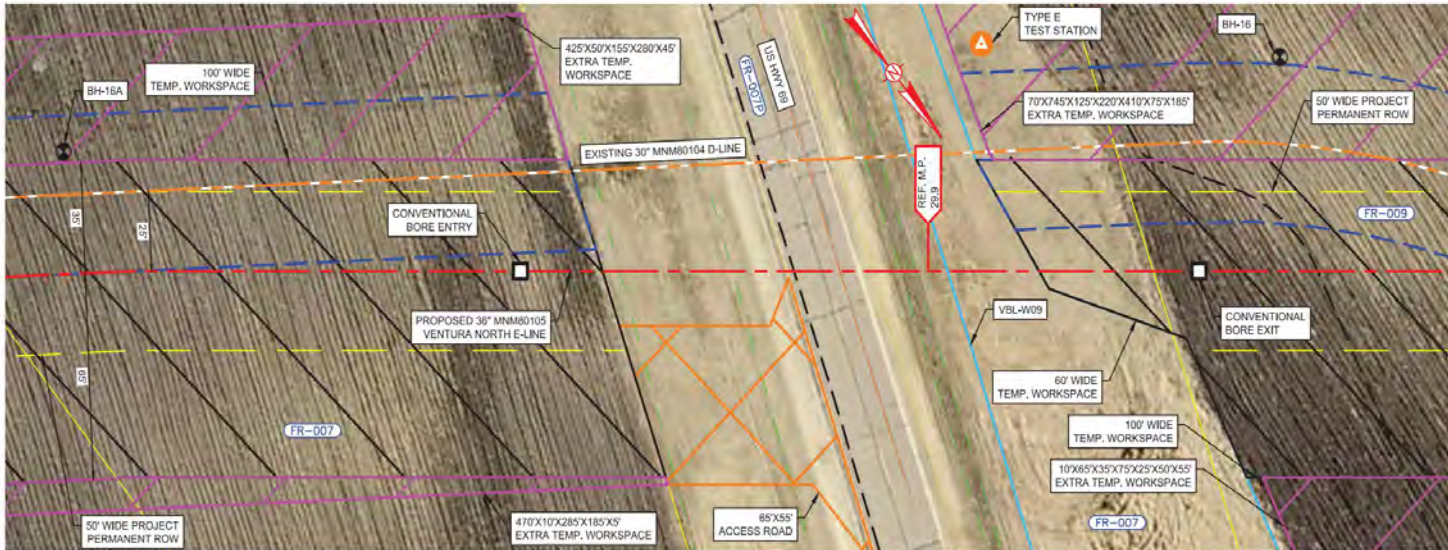


Tangent

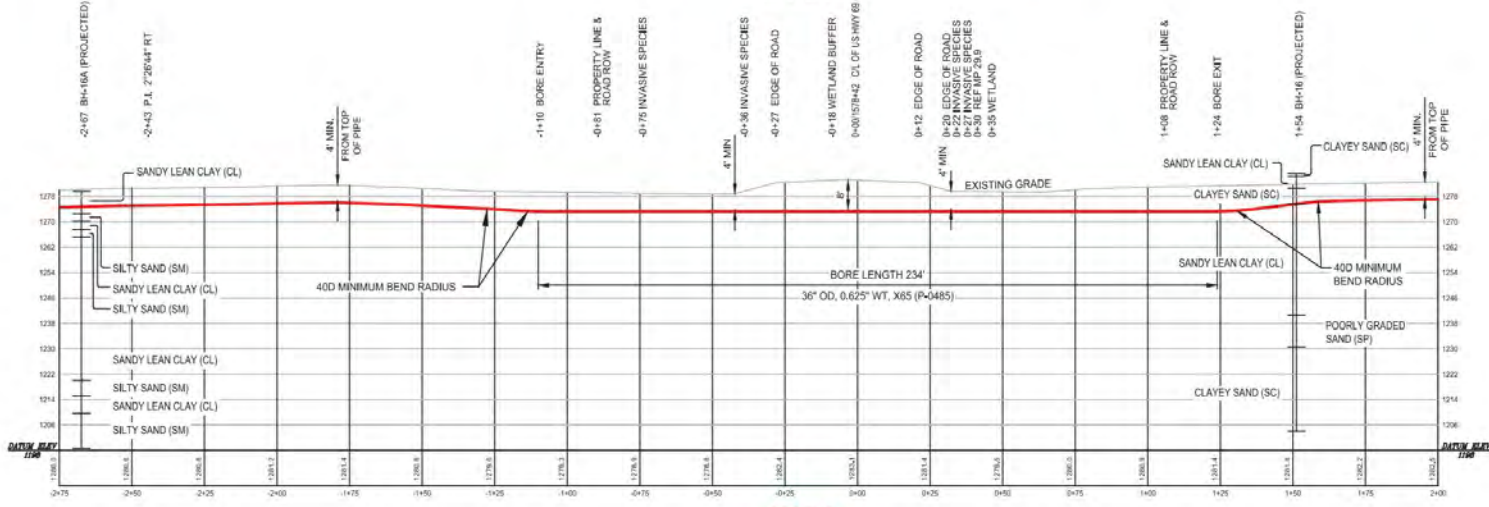


Deadend

Buried Work Typical



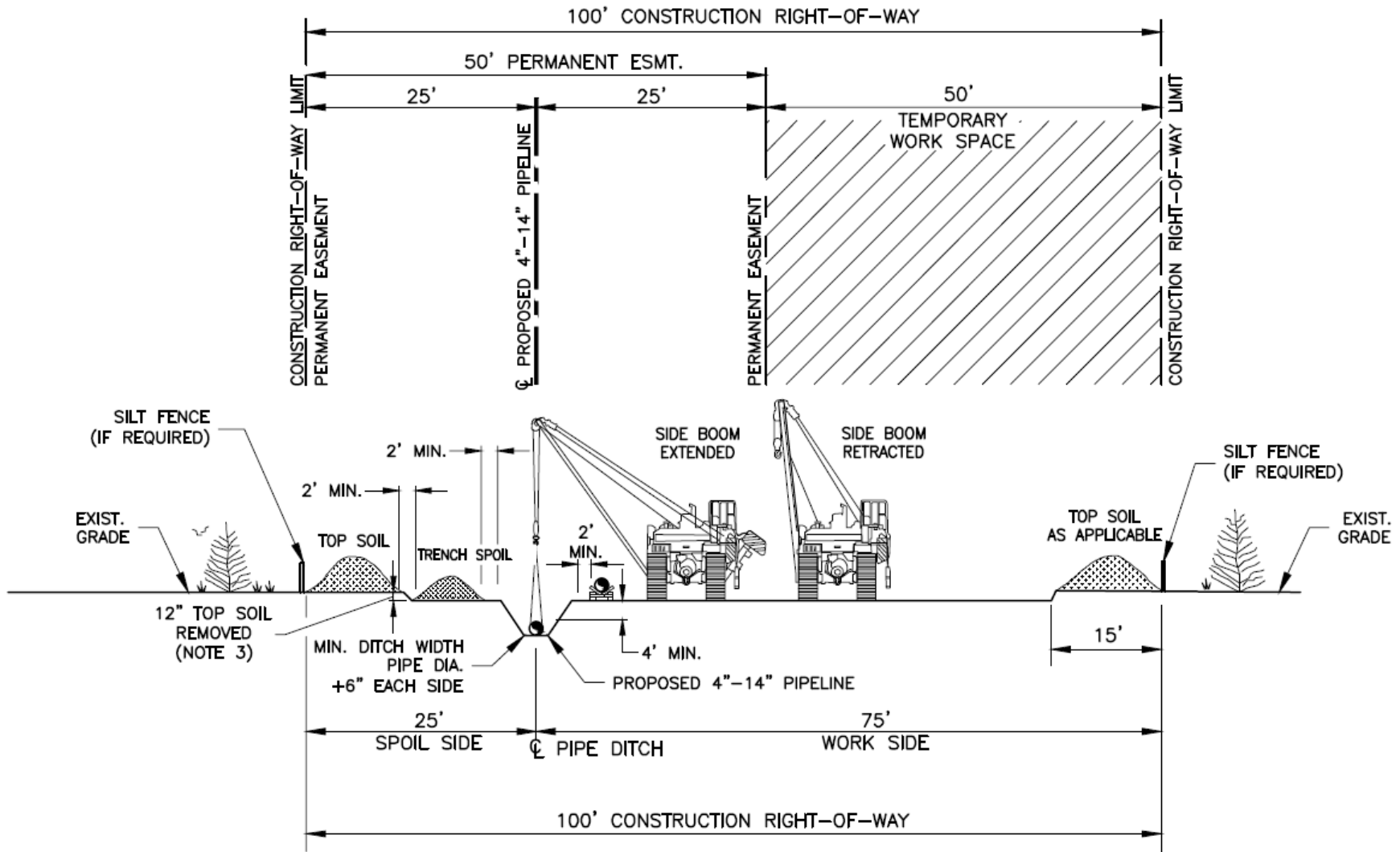
PLAN
SCALE: 1"=20'
REF DWG. P3-4



PROFILE
SCALE (VERT): 1"=20'
SCALE (HORIZ): 1"=20'

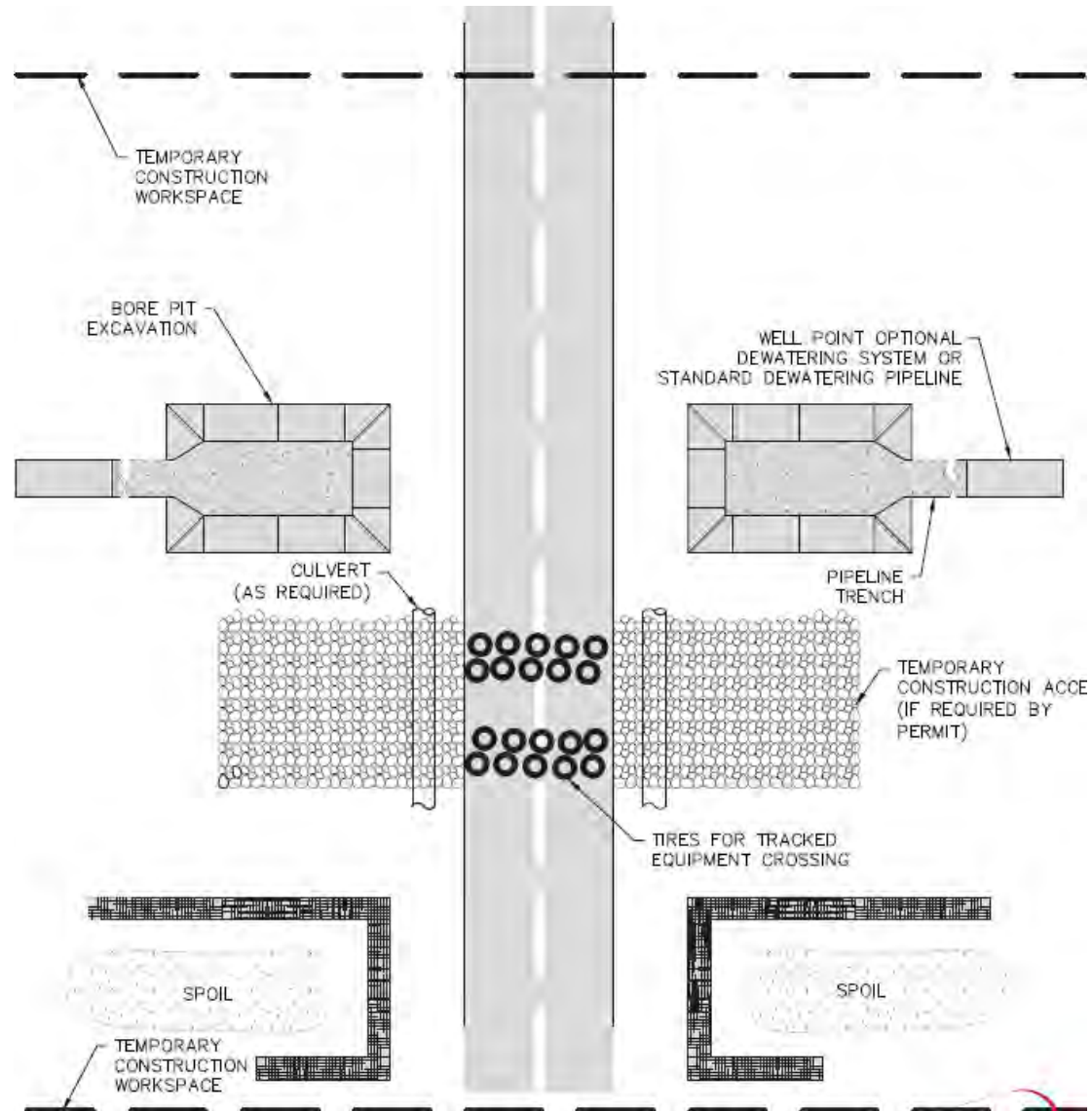
Buried Pipeline Crossing

Construction Workspace Typical



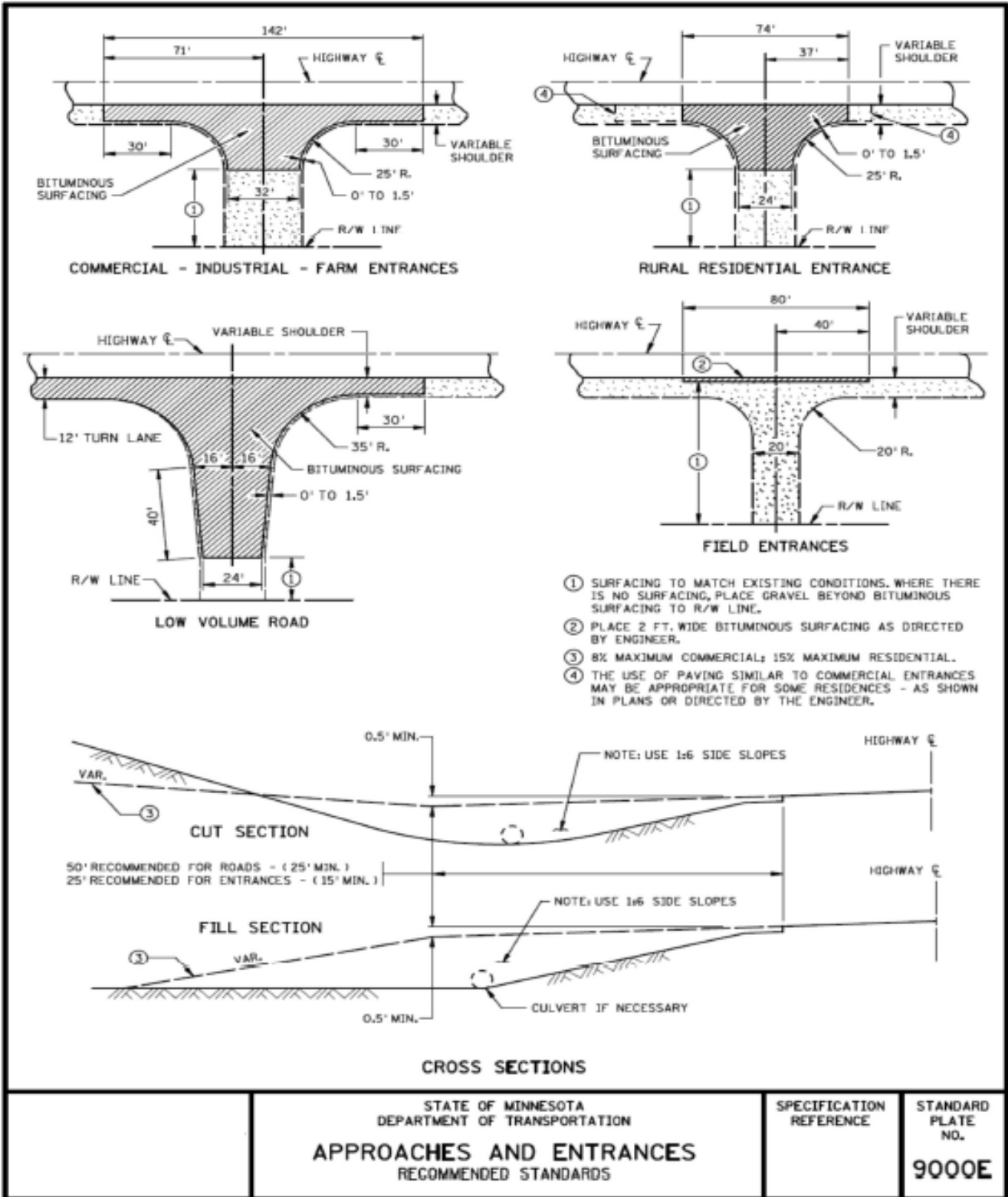
Profile – Pipeline installation

Construction Workspace Typicals



Plan View – Road Crossing Typical

ROW Access Typical



Access Road Cross Sections (Variety)

From: [Zach Golkowski \(MP\)](#)
To: [Annie Harala](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#); [Kevin Gray](#)
Subject: RE: [EXTERNAL MAIL] Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Thursday, April 24, 2025 9:08:28 AM
Attachments: [image001.png](#)

Hi Annie,

Thank you for the response. We look forward to any input the County may have and look forward to working with you all.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Annie Harala <HaralaA@StLouisCountyMN.gov>
Sent: Monday, April 21, 2025 10:53 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Kevin Gray <GrayK@StLouisCountyMN.gov>
Subject: [EXTERNAL MAIL] Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

You don't often get email from haralaa@stlouiscountymn.gov. [Learn why this is important](#)



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Don't slip up this winter! Remember not to click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Greetings,

I have received this letter and have routed to pertinent staff. Should they have any input, they will submit through the channels indicated in your communication.

Thank you,
Annie

Get [Outlook for iOS](#)

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Sent: Friday, April 18, 2025 2:38:28 PM

To: Annie Harala <HaralaA@StLouisCountyMN.gov>

Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>

Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

WARNING: External email. Please verify sender before opening attachments or clicking on links.

To Whom it May Concern:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust
612.746.3677 direct

612.816.2097mobile

mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

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P.O. Box 47, Waukesha, WI 53187-0047
866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

St. Louis County
Board of Commissioners
100 N 5th Ave W, Room 202
Duluth, MN 55802

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

To Whom it May Concern:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026.

As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach regarding the Project through letters, meetings, and open houses. At this stage of in the development of the Project, we want to make you aware of the Project and ask you to provide any information that you might have that would be helpful as we develop potential routes for the proposed transmission line. This information could be regarding potential route options or potential

April 18, 2025

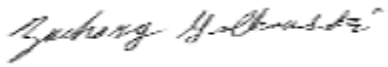
Page 2

constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission's approval process.

Please let me know if you have information that the Applicants should consider in evaluating and routing the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgoldowski@mpower.com. I am happy to discuss any questions that you may have about the Project.

Please distribute this information to other officials.

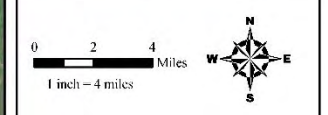
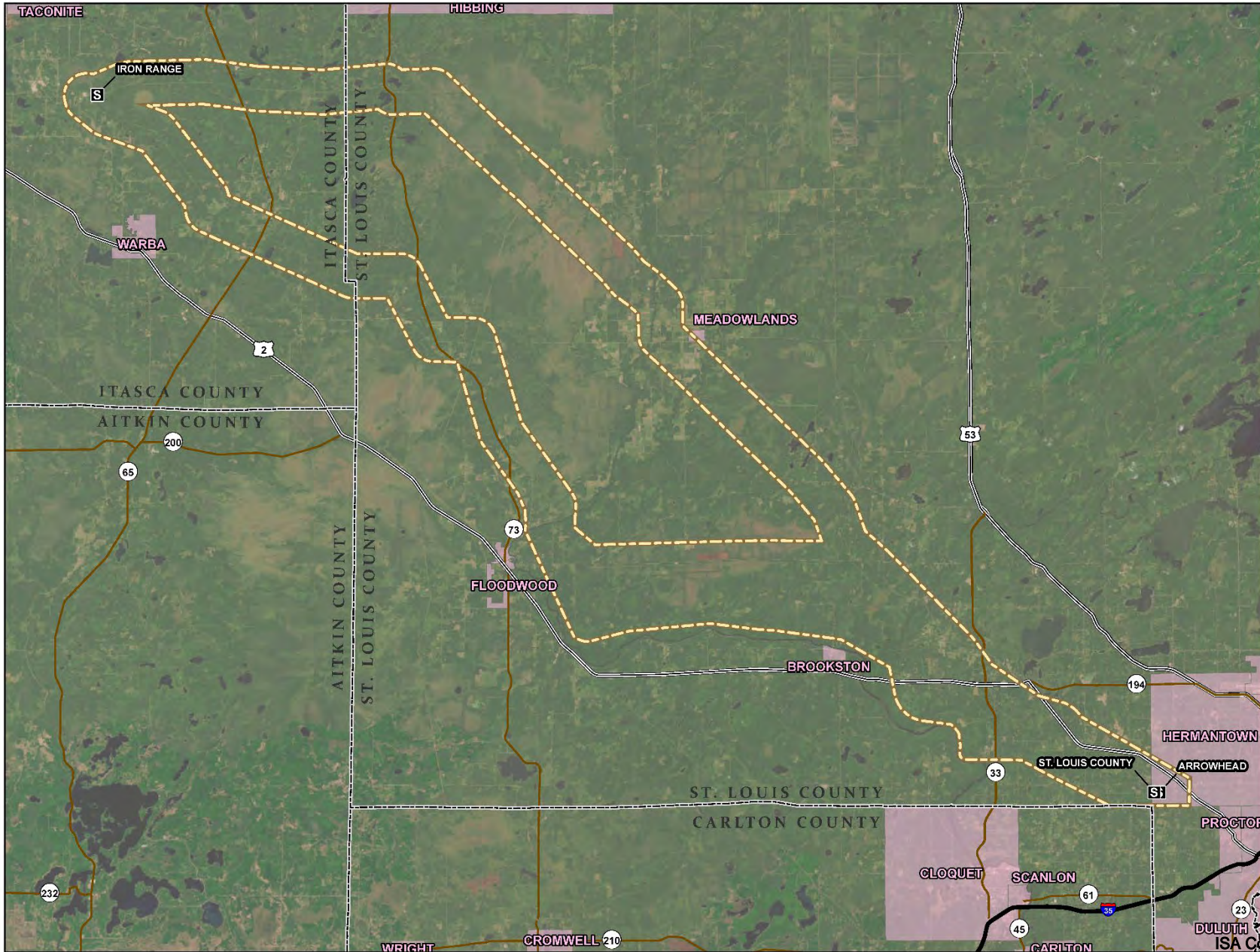
Sincerely,

A handwritten signature in cursive script, appearing to read "Zachary Golkowski", enclosed in a thin rectangular border.

Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures: Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 128 of 248

From: [Zach Golkowski \(MP\)](#)
To: [Wilson, Grant \(DNR\)](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#); [Spicer, Clarissa \(She/They\) \(DNR\)](#); [Rokala, Joe A \(DNR\)](#); [Parson, Jessica \(DNR\)](#)
Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Thursday, April 24, 2025 9:01:16 AM
Attachments: [image001.png](#)

Grant,

Thank you for the response. We look forward to working with the DNR on this project.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Wilson, Grant (DNR) <grant.wilson@state.mn.us>
Sent: Monday, April 21, 2025 7:53 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgoldkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Spicer, Clarissa (She/They) (DNR) <clarissa.spicer@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; Parson, Jessica (DNR) <jessica.parson@state.mn.us>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Thank you for your message. I have passed it to appropriate DNR folks in our Northeast Region.

Grant

Grant L. Wilson

Central Region Director

Minnesota Department of Natural Resources

651-259-5635

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Sent: Friday, April 18, 2025 1:36 PM

To: Wilson, Grant (DNR) <grant.wilson@state.mn.us>

Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>

Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Grant Wilson:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,

Mandy Bohnenblust on behalf of

Zach Golkowski

Project Manager – Environmental

Minnesota Power

Mandy Bohnenblust

612.746.3677 direct

612.816.2097mobile

mandy.bohnenblust@merjent.com



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866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Grant Wilson
Minnesota Department of Natural Resources
Regional Director
1200 Warner Rd
St. Paul, MN 55106
Grant.wilson@state.mn.us

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Grant Wilson:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

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The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. We appreciate your assistance as we evaluate siting and routing information and work through the Commission’s approval process.

April 18, 2025

Page 2

On behalf of the Applicants, Merjent will submit a formal Natural Heritage Review Request through the Minnesota Department of Natural Resources' ("DNR") Minnesota Conservation Explorer ("MCE"). The Applicants look forward to working with the DNR to avoid and minimize impacts to state-protected species.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgoldowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

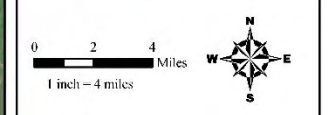
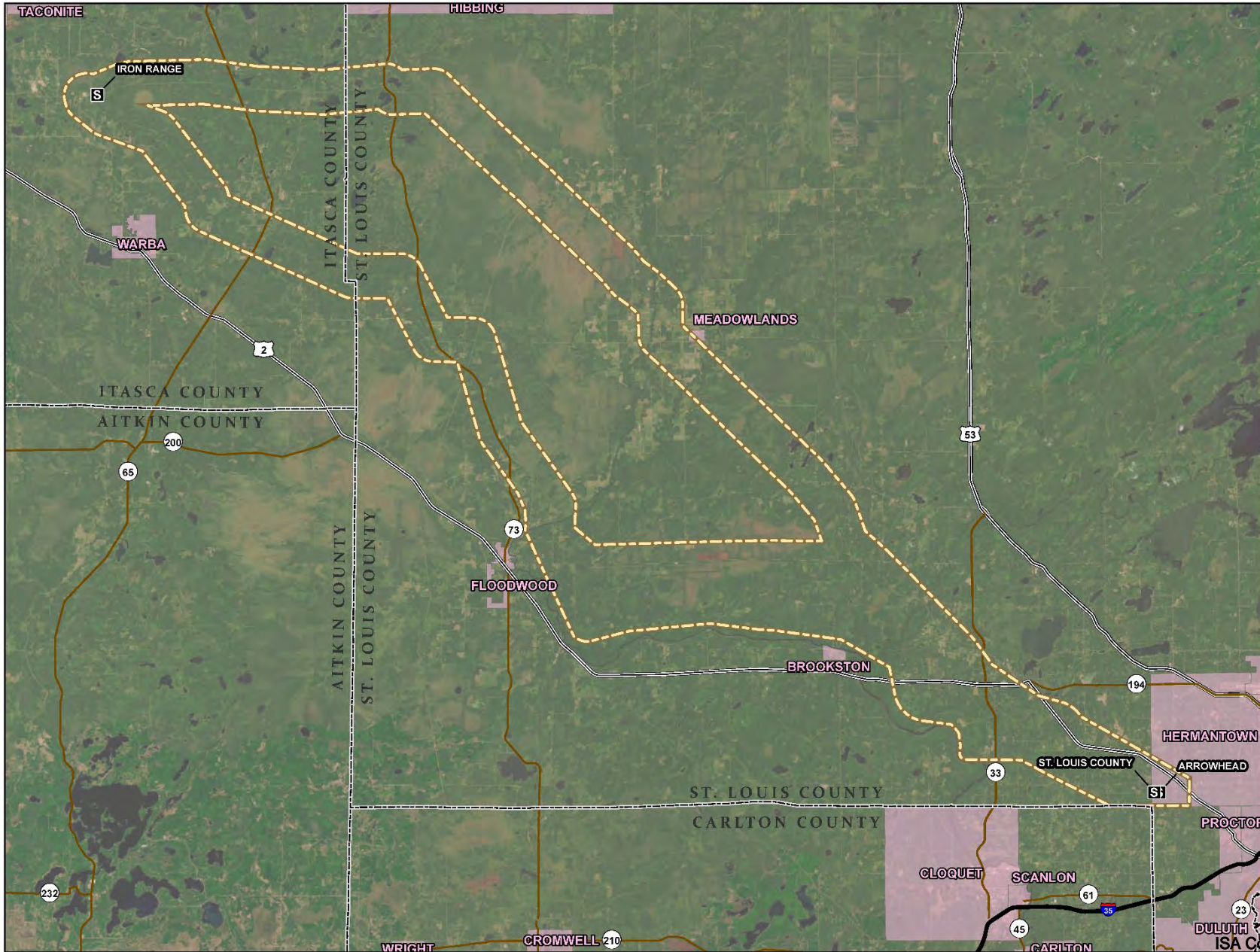
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 134 of 248

From: [Nicole Sherry](#)
To: "Budde, Nick (MDH)"; [Zach Golkowski \(MP\)](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#); [Woodside, John \(MDH\)](#); [Parthun, Chris \(MDH\)](#); [Bell, David \(MDH\)](#)
Subject: RE: EXTERNAL: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Thursday, April 24, 2025 8:53:30 AM
Attachments: [image001.png](#)

Thanks, Nick!

I just submitted the form.

Nicole Sherry

612.354.4289 direct

952.200.4308 mobile

nicole.sherry@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660

www.merjent.com

From: Budde, Nick (MDH) <nicholas.budde@state.mn.us>
Sent: Thursday, April 24, 2025 10:30 AM
To: Zach Golkowski (MP) <z Golkowski@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Woodside, John (MDH) <john.woodside@state.mn.us>; Parthun, Chris (MDH) <chris.parthun@state.mn.us>; Bell, David (MDH) <david.bell@state.mn.us>; Nicole Sherry <nicole.sherry@merjent.com>
Subject: EXTERNAL: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

CAUTION: This email originated from outside of Merjent.

The agreement form has a field that asks how the data will be used. Merjent should mention in that field that they are working and sharing data with you (Minnesota Power) on the transmission line project. In the later field that asks how the data will be managed and secured, make sure they mention both Merjent and Minnesota Power's processes/access. I think that should cover you.

Nick Budde

Wellhead Protection Hydrologist | Source Water Protection

Minnesota Department of Health

Office: 651-201-4596

From: Zach Golkowski (MP) <z Golkowski@mnpower.com>

Sent: Thursday, April 24, 2025 9:55 AM

To: Budde, Nick (MDH) <nicholas.budde@state.mn.us>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Cc: Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Woodside, John (MDH) <john.woodside@state.mn.us>; Parthun, Chris (MDH) <chris.parthun@state.mn.us>; Bell, David (MDH) <david.bell@state.mn.us>; Nicole Sherry <nicole.sherry@merjent.com>

Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

Thank you, Nick.

Merjent's GIS staff can complete the agreement and make the request as they will be managing the data. If Minnesota Power would also like to view the data, would we also need to sign the agreement?

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Budde, Nick (MDH) <nicholas.budde@state.mn.us>

Sent: Thursday, April 24, 2025 8:02 AM

To: Zach Golkowski (MP) <z Golkowski@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Cc: Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Woodside, John (MDH) <john.woodside@state.mn.us>; Parthun, Chris (MDH) <chris.parthun@state.mn.us>; Bell, David (MDH) <david.bell@state.mn.us>

Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Hi Zach,

Since exact public water supply well locations are not public information, you'd need to agree to MDH's data use practices and make the request for the public water supply well data through the following link:

<https://survey.vovici.com/se/56206EE30406D2AC>

Our data team can then work with you to get you the public water supply wells in your project area of interest.

Thanks,

Nick Budde

Wellhead Protection Hydrologist | Source Water Protection

Minnesota Department of Health

Office: 651-201-4596

From: Zach Golkowski (MP) <zgolkowski@mnpower.com>

Sent: Wednesday, April 23, 2025 2:13 PM

To: Budde, Nick (MDH) <nicholas.budde@state.mn.us>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Cc: Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Woodside, John (MDH) <john.woodside@state.mn.us>; Parthun, Chris (MDH) <chris.parthun@state.mn.us>; Bell, David (MDH) <david.bell@state.mn.us>

Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

Nick,

Thank you for your detailed response and for providing the map with the approximate locations of public water supply wells. Is it possible for you to send a kmz or shapefile with the public water supply well data, so we can use it as we continue to refine the Study Area and develop a proposed route? We do have the non-public data available from the MN Well Index database.

At this time, the ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We are currently requesting feedback from local, state, and federal agencies regarding the Study Area and are planning a number

of open houses to facilitate additional feedback from the public. As we narrow down the Study Area and identify possible routes, we will evaluate the DWSMA data and reach out to cities, as necessary, per your recommendation below.

Thank you again and we look forward to working with you.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Budde, Nick (MDH) <nicholas.budde@state.mn.us>
Sent: Monday, April 21, 2025 10:58 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgoldkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Woodside, John (MDH) <john.woodside@state.mn.us>; Parthun, Chris (MDH) <chris.parthun@state.mn.us>; Bell, David (MDH) <david.bell@state.mn.us>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Hi Mandy and team:

The attached map has the approximate locations of public water supply wells (both community and non-community) in the area and has the boundaries of city Drinking Water Supply Management

Areas, which are managed by cities to protect their drinking water sources. If the project passes through any of the Drinking Water Supply Management Areas, please reach out to the affected city to see if they have any concerns. [Linked](#) is a web map viewer of these protected areas. It appears the proposed project may pass through or near management areas for the cities of Warba, Floodwood, and Meadowlands. Also, the Minnesota Well Index ([link](#)) map viewer can be used to locate any non-public water supply wells in the project area.

Thanks,
Nick

Nick Budde

Wellhead Protection Hydrologist | Source Water Protection

Minnesota Department of Health

Office: 651-201-4596

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 7:17 PM
To: Budde, Nick (MDH) <nicholas.budde@state.mn.us>
Cc: Zach Golkowski (MP) <zgolowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Nick Budde:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolowski@mnpower.com should you need additional information.

Regards,

Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust

612.746.3677 direct

612.816.2097mobile

mandy.bohnenblust@merjent.com



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P.O. Box 47, Waukesha, WI 53187-0047
866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Nick Budde
Minnesota Department of Health
Hydrologist
P.O. Box 64975
St. Paul, MN 55164
nicholas.budde@state.mn.us

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Nick Budde:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that

April 18, 2025

Page 2

will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission's approval process.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

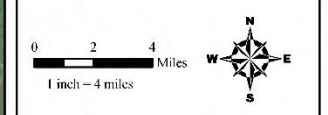
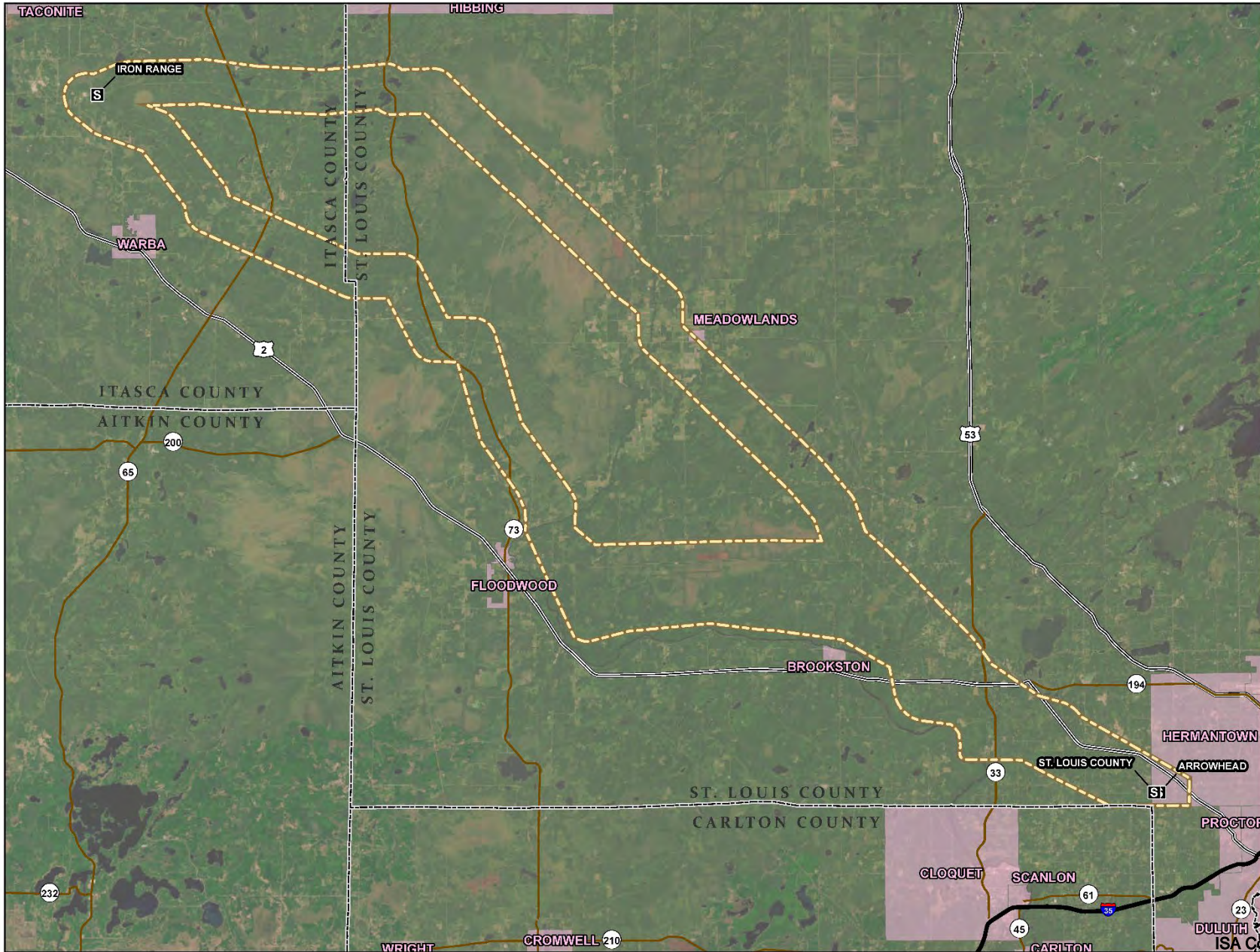
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 143 of 248

From: Tawes, Robert <robert_tawes@fws.gov>
Sent: Thursday, April 24, 2025 1:51 PM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: O'Brien, Katie E <katie_obrien@fws.gov>
Subject: EXTERNAL: Re: [EXTERNAL] Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

CAUTION: This email originated from outside of Merjent.

Hi Mandy. We would like to comment on this project and route selection. What is your comment deadline?

Rob Tawes | Field Supervisor
U.S. Fish and Wildlife Service
Minnesota-Wisconsin Ecological Services Field Office

3815 American Blvd. East, Bloomington, MN 55425-1665

Mobile: (651) 895-5433

Email: robert_tawes@fws.gov

Offices: **Bloomington | Green Bay | Madison**



<https://www.fws.gov/office/minnesota-wisconsin-ecological-services>

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 1:32 PM
To: Tawes, Robert <robert_tawes@fws.gov>
Cc: Zach Golkowski (MP) <z Golkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: [EXTERNAL] Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Robert Tawes:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust
612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



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From: [Zach Golkowski \(MP\)](#)
To: robert_tawes@fws.gov; katie_obrien@fws.gov
Cc: [Mandy Bohnenblust](#); [Dan Flo](#); [Marissa Honeycutt](#)
Subject: RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Thursday, April 24, 2025 12:47:33 PM

Hi Rob,

Thanks for responding and for offering to provide comments. At this time, the ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities (the area shown in the map we provided). We are currently requesting feedback from local, state, and federal agencies regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public with the goal of narrowing down a proposed route this summer. That being said, it would be helpful to have comments from FWS by the end of May, if possible.

We will use IPaC to determine which federally listed species have been documented with the vicinity of the proposed route and will work with the MNDNR regarding state-listed species. The project will also follow all applicable laws and acts include MBTA and BGEPA.

We would also be happy to set up a meeting with FWS to provide additional project details, as they are available, to answer questions, and receive comments. Please let us know if that is something we can get set up and if there are dates/times that work best for you.

Thank you again – we look forward to working with you on this project.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: [Zach Golkowski \(MP\)](#)
To: [Luzinski, Danielle \(MDH\)](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#); [Budde, Nick \(MDH\)](#); [Silvers, Kira \(She/Her/Hers\) \(MDH\)](#); [Parthun, Chris \(MDH\)](#); [Woodside, John \(MDH\)](#)
Subject: Re: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Thursday, May 1, 2025 7:17:30 AM
Attachments: [image001.png](#)

Danielle,

Thank you for your response. The ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We are currently requesting feedback from local, state, and federal agencies and tribal representatives regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public.

As we develop a proposed route, we will consider the recommended methods provided by the Department of Health and will evaluate the additional well information provided by Nick Budde. We look forward to working with the Department of Health as the project progresses.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366
C: 218-428-5582

From: Luzinski, Danielle (MDH) <Danielle.Luzinski@state.mn.us>
Sent: Monday, April 28, 2025 9:57 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Budde, Nick (MDH) <nicholas.budde@state.mn.us>; Silvers, Kira (She/Her/Hers) (MDH) <Kira.Silvers@state.mn.us>; Parthun, Chris (MDH) <chris.parthun@state.mn.us>; Woodside, John (MDH) <john.woodside@state.mn.us>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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company.

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Good morning Mandy,

Thank you for sending along this information and allowing MDH the opportunity to submit comments. Please see the attached response letter from MDH and let us know if you have any additional questions.

Thank you!

Danielle

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Sent: Friday, April 18, 2025 7:13 PM

To: Luzinski, Danielle (MDH) <Danielle.Luzinski@state.mn.us>

Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>

Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Danielle Luzinski:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach

Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,

Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust

612.746.3677 direct

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mandy.bohnenblust@merjent.com



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866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Danielle Luzinski
Minnesota Department of Health
Statewide Surface Water Hydrologist
P.O. Box 64975
St. Paul, MN 55164
danielle.luzinski@state.mn.us

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Danielle Luzinski:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that

April 18, 2025

Page 2

will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission's approval process.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

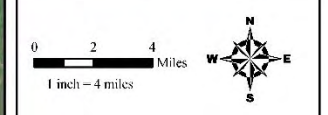
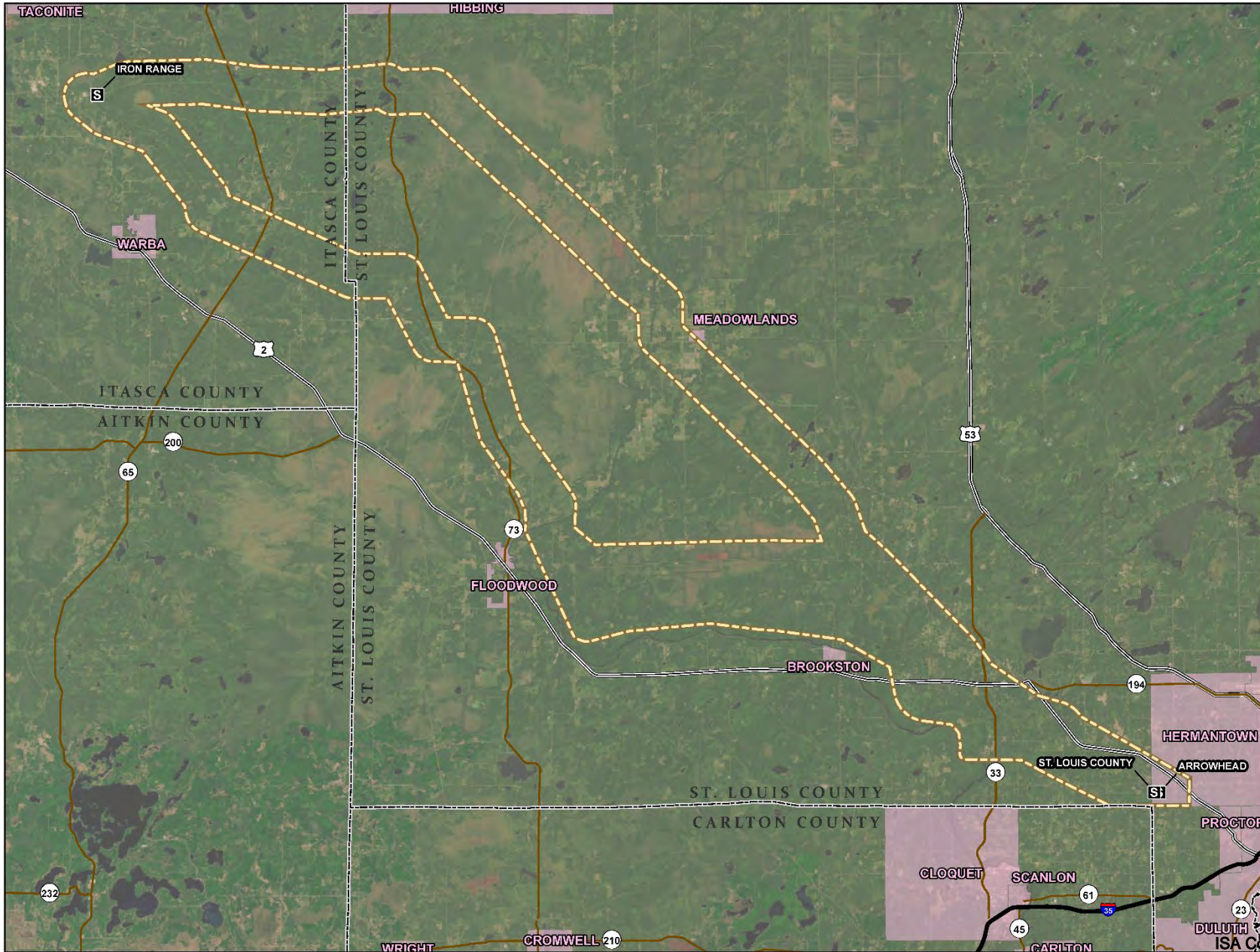
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

April 28, 2025

Zachary Golkowski
Project Manager – Environmental
ALLETE Inc.
30 West Superior Street
Duluth, MN 55802
zgolkowski@mnpower.com

RE: Written Comments for Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112

Dear Mr. Golkowski,

This letter is in response to your notification on April 18, 2025, regarding Minnesota Power’s proposal to construct a 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County to Minnesota Power’s St. Louis County Substation and a one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County. The Minnesota Department of Health (MDH) has reviewed the information that was submitted with the notification for potential impacts on the groundwater and drinking water resources that serve the area and support its public health.

Potential impacts of the proposed project include groundwater contamination in the event of a spill and limiting well owners’ access to properly maintain and seal wells. In order to ensure that access to clean and sufficient water is available, MDH proposing the following methods to mitigate potential impacts from this project:

- Contact information (name, address, phone number) for all well owners with wells located within 200’ of the future line should be identified and cataloged with the well location, for use in the event of a spill or release of hazardous substance. This list of wells should include identification of wells that are not included in the Minnesota Well Index (<https://health.state.mn.us/communities/environment/water/mwi/index.html>) and should also be provided to Nick.Budde@state.mn.us.
- Drill rigs with masts are typically required to service or seal abandoned wells. The presence of active powerlines near a well can make it difficult or impossible to safely

complete this necessary work. The proposed transmission line should be located far enough away from existing wells that safe and legal access for service or sealing with a drill rig is not impacted when the line is active at the maximum proposed voltage. Alternatively, accommodation should be made to well owners to provide an alternative source of water of similar chemistry and supply, as well as sealing of the existing well in accordance with Minnesota Statutes 103I.301 prior to energizing the transmission line to protect the aquifer.

Please refer to the additional well information provided by Nick Budde in an email dated April 21, 2025 and spatial data provided by Kira Silvers dated April 28, 2025. MDH would also like you to consider impacts to nearby surface waters during the construction phase as impaired runoff can negatively impact surface water quality and infiltrate into the groundwater. Properly maintained erosion and sediment control measures are critical to ensuring protected water quality. There are no communities that source their drinking water from a surface waterbody within your proposed project area.

Thank you for your consideration regarding these proposed mitigation methods. If you have any questions, please feel free to contact me at Danielle.Luzinski@state.mn.us or (651) 201-5011. You may also contact the district hydrologist, Nick Budde, at Nick.Budde@state.mn.us or (651) 259-5072.

Sincerely,



Danielle Luzinski, Statewide Surface Water Hydrologist
Minnesota Department of Health
Source Water Protection Unit
PO Box 64975
St. Paul, MN 55164-0975
www.health.state.mn.us

CC: Nick Budde, MDH Source Water Protection Unit
Kira Silvers, MDH Source Water Protection Unit
Chris Parthun, MDH Source Water Protection Unit
John Woodside, MDH Source Water Protection Unit

From: [Zach Golkowski \(MP\)](#)
To: [Drake, James F \(DNR\)](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#)
Subject: RE: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Thursday, May 1, 2025 12:39:04 PM
Attachments: [image001.png](#)

Hi Jim,

Thank you for the response. We are very familiar with the MCE system and plan to use it for this project. The ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We plan to submit an MCE request later in the route development process.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Drake, James F (DNR) <James.F.Drake@state.mn.us>
Sent: Thursday, May 1, 2025 12:51 PM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Hi Mandy,

The best way to get comments on potential impacts to rare features is to request a Natural Heritage Review. To do so, please submit a request through [Minnesota Conservation Explorer](#) (MCE).

Jim

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, April 18, 2025 2:36 PM
To: Drake, James F (DNR) <James.F.Drake@state.mn.us>
Cc: Zach Golkowski (MP) <z Golkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Jim Drake:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or z Golkowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust
612.746.3677 direct
612.816.2097mobile

mandy.bohnenblust@merjent.com



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866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Jim Drake
Minnesota Department of Natural Resources
Natural Heritage Review Specialist
500 Lafayette Rd
St. Paul, MN 55155
jim.drake@state.mn.us

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Jim Drake:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. We appreciate your assistance as we evaluate siting and routing information and work through the Commission’s approval process.

April 18, 2025

Page 2

On behalf of the Applicants, Merjent will submit a formal Natural Heritage Review Request through the Minnesota Department of Natural Resources' ("DNR") Minnesota Conservation Explorer ("MCE"). The Applicants look forward to working with the DNR to avoid and minimize impacts to state-protected species.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgoldowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

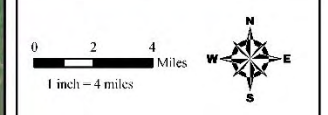
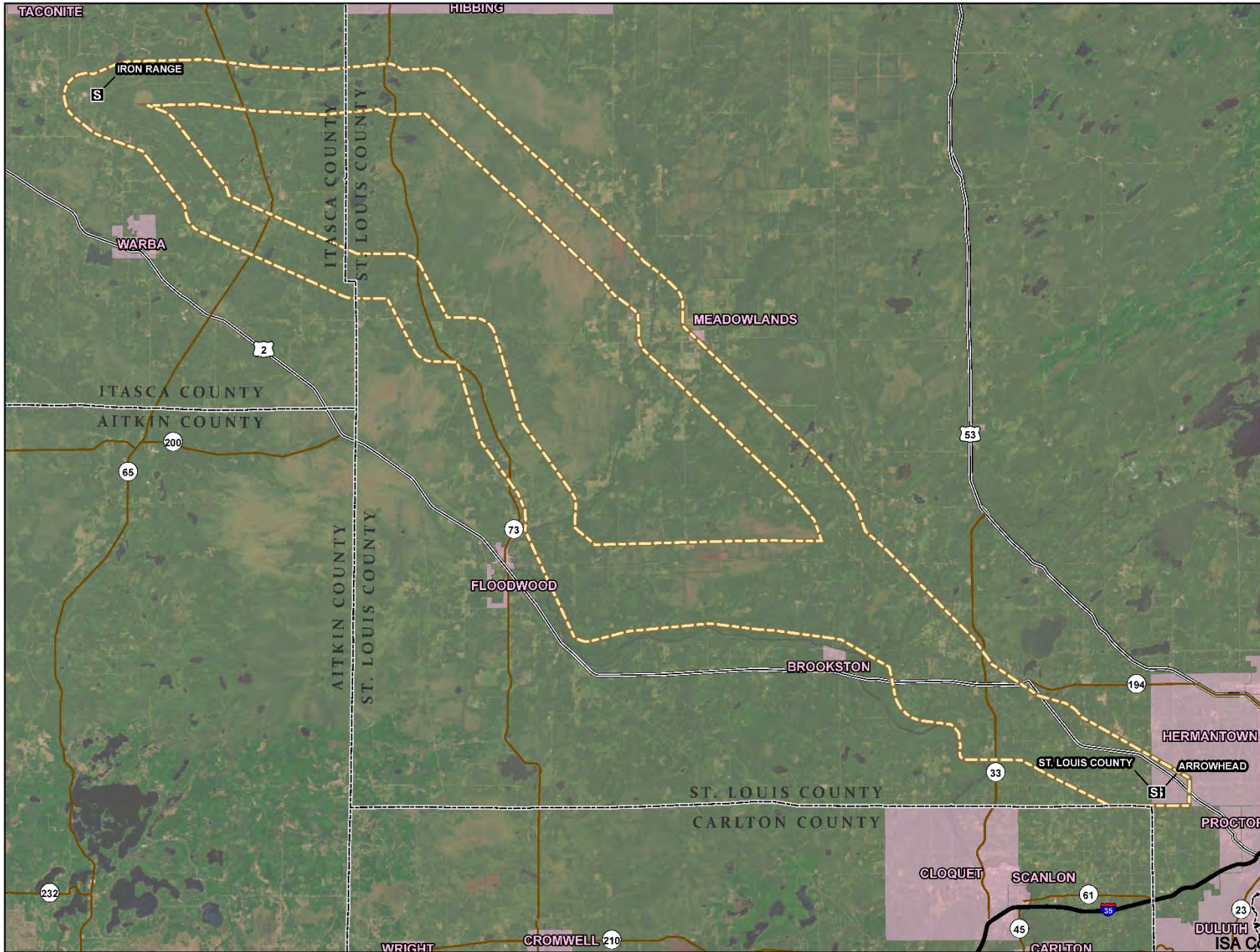
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Welcome to the Minnesota Conservation Explorer!



The Minnesota Conservation Explorer is an online tool to enhance the delivery of Minnesota's Natural Heritage Data and to automate the Natural Heritage Review process. The Minnesota Conservation Explorer can be used to explore public data available for conservation planning, to request an automated Natural Heritage Review, and, for authorized users, to access nonpublic data. Summary information is provided below. Click on the headings for more details.

Conservation Planning (conservation-planning)

The Minnesota Conservation Explorer allows users to view and explore spatial information useful for desktop site assessments, land use planning, or conservation planning. The spatial information consists of publicly available layers relevant to Minnesota's Natural Heritage, as well as several reference layers. Users can define an area of interest and then create maps or conservation planning reports for that area. This service is free and does not require the user to register or log in. To begin exploring Minnesota's Natural Heritage data, click on the Explore Tab above. The Help Tab provides instructions for navigating the tool.

Natural Heritage Review (natural-heritage-review)

Registered users can submit a proposed project and request an automated assessment of potential impacts to Minnesota's rare features. This review informs project proposers of any required actions to follow state law, recommended measures to avoid or minimize disturbance to ecologically significant areas or state-listed species, and, if needed, additional steps needed to complete the review.

A Natural Heritage Review is required as part of Minnesota's environmental review process. In addition, a Natural Heritage Review is strongly encouraged for all projects as due diligence for following state law and considering impacts to Minnesota's Natural Heritage. Users must register and log in. Please see the [fee schedule \(https://files.dnr.state.mn.us/eco/nhnrp/obtaining-nhis-data.pdf\)](https://files.dnr.state.mn.us/eco/nhnrp/obtaining-nhis-data.pdf) for this service.

Nonpublic Data Access (nonpublic-data-access)

Only licensees and authorized DNR staff can view the known locations of state-listed species. Users must complete the required training, create an account, and login to view the NHIS nonpublic data layers.

If your organization is interested in pursuing a license with the DNR to gain access to nonpublic data on state-listed species, please fill out and submit a [License Agreement Application \(https://files.dnr.state.mn.us/eco/nhnrp/license_agreement_form.pdf\)](https://files.dnr.state.mn.us/eco/nhnrp/license_agreement_form.pdf). Please see the [fee schedule \(https://files.dnr.state.mn.us/eco/nhnrp/obtaining-nhis-data.pdf\)](https://files.dnr.state.mn.us/eco/nhnrp/obtaining-nhis-data.pdf) for this service.

DNR staff who have taken the NHIS Training, please create an account and then contact [mce.dnr@state.mn.us \(mailto:mce.dnr@state.mn.us?subject=MCE%20Permissions\)](mailto:mce.dnr@state.mn.us) to have your MCE permissions upgraded.

Funding for this project was provided, in part, by the Minnesota Environment and Natural Resources Trust Fund as recommended by the Legislative-Citizen Commission on Minnesota Resources (LCCMR). The Trust Fund is a permanent fund constitutionally established by the citizens of Minnesota to assist in the protection, conservation, preservation, and enhancement of the state's air, water, land, fish, wildlife, and other natural resources.

User login

E-mail or username *

Password *

[Create new account \(/user/register\)](/user/register)

[Request new password \(/user/password\)](/user/password)

Log in

MCE 1.5 | [MN DNR \(https://www.dnr.state.mn.us/\)](https://www.dnr.state.mn.us/) | [Site Terms of Use \(legal\)](#) | A Partner of the [NatureServe Network \(http://www.natureserve.org/natureserve-network\)](http://www.natureserve.org/natureserve-network) © 2025

[.\(https://natureserve.org\)](https://natureserve.org)

From: [Amber Lyons](#)
To: [Amber Lyons](#)
Subject: FW: EXTERNAL: RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Thursday, October 2, 2025 11:51:53 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[MinnesotaPower ISA Project Data.zip](#)

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Friday, May 2, 2025 2:10 PM
To: Parson, Jessica (DNR) <jessica.parson@state.mn.us>; Zach Golkowski (MP) <zgolkowski@mnpower.com>
Cc: Spicer, Clarissa (She/They) (DNR) <clarissa.spicer@state.mn.us>; Bump, Samantha (DNR) <samantha.bump@state.mn.us>; Schindler, Darrell (DNR) <darrell.schindler@state.mn.us>; Root, Greg (DNR) <greg.root@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; #DNR_R2_REAT <R2_REAT.DNR@state.mn.us>; Marissa Honeycutt <marissa.honeycutt@merjent.com>; Dan Flo <dan.flo@merjent.com>
Subject: RE: EXTERNAL: RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

Hi Jessica,

Thank you for your email. We look forward to working with you until an application is submitted to the PUC and thereafter working with Samantha.

Per your initial request, attached is a shapefile the includes the Study Area and existing HVTL lines within the Study Area. The Applicants are anticipating being more than 80% collocated with existing transmission lines within the Study Area.

We would be happy to schedule a meeting and can come prepared with a presentation providing more information on the project. Zach will be getting in touch with you next week.

Thank you,
Mandy, on behalf of Zach.

Mandy Bohnenblust
612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414

612.746.3660 main
www.merjent.com

From: Parson, Jessica (DNR) <jessica.parson@state.mn.us>
Sent: Friday, May 2, 2025 11:32 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Zach Golkowski (MP) <zgolkowski@mnpower.com>
Cc: Spicer, Clarissa (She/They) (DNR) <clarissa.spicer@state.mn.us>; Bump, Samantha (DNR) <samantha.bump@state.mn.us>; Schindler, Darrell (DNR) <darrell.schindler@state.mn.us>; Root, Greg (DNR) <greg.root@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; #DNR_R2_REAT <R2_REAT.DNR@state.mn.us>
Subject: EXTERNAL: RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

CAUTION: This email originated from outside of Merjent.

Good Morning Mandy and Zach,

I wanted to reach out to confirm receipt of the previous message (below) sent 4/21.

According to the letter sent 4/18, you plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for this MISO Project in early 2026. The letter also indicates letters, meetings, and open houses will be utilized for outreach to agencies, tribal entities, stakeholders, and the public.

I met recently with both Joe Rokola and Samantha Bump to discuss early coordination for this project. We all agreed that a kickoff meeting with MN DNR local area specialists (and perhaps other regulatory agencies) that cover this area would be something would be useful to request. A presentation about the project, opportunity to discuss the project, an explanation of the environmental review and permitting process being utilized, timeline, and how you will be using feedback on routing would be a productive way to begin coordination.

We would like to provide you with any routing concerns early to help make the formal processes go as smoothly as possible. Incorporating agency feedback and considering recommendations from the agencies into the proposal prior to submission to the PUC will facilitate this.

Please let me know what you think. We look forward to meeting with you.

Jessica Parson

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Minnesota Department of Natural Resources

1201 Highway 2

Grand Rapids, MN 55744

Phone: 218-328-8826

Email: Jessica.Parson@state.mn.us

mndnr.gov



From: Parson, Jessica (DNR)

Sent: Monday, April 21, 2025 9:37 AM

To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Zach Golkowski (MP) <zgolkowski@mnpower.com>

Cc: Carpenter, Charles (DNR) <charles.carpenter@state.mn.us>; Spicer, Clarissa (She/They) (DNR) <clarissa.spicer@state.mn.us>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>; Schindler, Darrell (DNR) <darrell.schindler@state.mn.us>; Root, Greg (DNR) <greg.root@state.mn.us>

Subject: RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

Good Morning Mandy and Zach,

I wanted to reach out to let you know I will be handling early coordination for this project on behalf of the Minnesota DNR. I will be the point of contact until the submission to the PUC, at which point it will shift to Samantha Bump, our energy projects coordinator. Thank you for bringing this project to our attention.

Could you please provide a shapefile of the project study area, with as much detail as you have at this point (such as brownfield vs greenfield, underground, additional infrastructure)?

Looking forward to working with you.

Thank you,

Jessica Parson

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Minnesota Department of Natural Resources

1201 Highway 2

Grand Rapids, MN 55744

Phone: 218-328-8826

Email: Jessica.Parson@state.mn.us

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From: [Zach Golkowski \(MP\)](#)
To: [Christopherson, Chase \(He/Him/His\) \(COMM\)](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#)
Subject: Re: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Wednesday, May 7, 2025 10:27:45 AM
Attachments: [image002.png](#)
[image003.png](#)

Good afternoon Chase and thank you for your response.

The ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities (the area shown in the map we provided, also attached here for your reference). We are currently requesting feedback from local, state, and federal agencies and tribal representatives regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public.

The Project has sent similar project introduction letters to the tribal historic preservation offices and tribal government contacts on the Minnesota Public Utilities Commission's (MPUC) contact lists maintained on the MPUC's docket and will continue to provide updates to those contacts in advance of major Project milestones. Minnesota Power would be happy to meet with any tribal representatives who express interest in the Project and would like to receive additional information.

At this time, the Project anticipates filing a MPUC Certificate of Need Notice Plan in or around September, 2025, and a combined Certificate of Need / Route Permit application in February of 2026. Between now and next February, Minnesota Power will continue to evaluate potential routes for the Project using comprehensive desktop environmental and cultural resources evaluations and incorporating input from public agencies, tribal representatives, and the public.

Please let us know if you have any further questions.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366
C: 218-428-5582

From: Christopherson, Chase (He/Him/His) (COMM) <Chase.Christopherson@state.mn.us>
Sent: Friday, April 25, 2025 11:13 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;

Marissa Honeycutt <marissa.honeycutt@galileoaz.com>

Subject: [EXTERNAL MAIL] RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Good morning Mandy,

It is nice to meet you and I appreciate you providing this information. Have you had engagement with the tribal nations on this project and submission? Do you have maps of the proposed route(s) or environmental/cultural impact assessments that you could send me? The State of Minnesota Commerce Department is working with the newly formed Tribal Advocacy Council on Energy (TACE), and I will bring this to their attention as well. Thank you and I look forward to learning more about this proposal and speaking with you. Take care.

Best wishes,

Chase Christopherson
Tribal Advocacy Council on Energy (TACE) Tribal Liaison
Division of Energy Resources
D: 952-905-6995
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101



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From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Sent: Friday, April 18, 2025 7:20 PM

To: Christopherson, Chase (He/Him/His) (COMM) <Chase.Christopherson@state.mn.us>

Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;

Marissa Honeycutt <marissa.honeycutt@galileoaz.com>

Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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Chase Christopher:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,

Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power/ALLETE, Inc.

Mandy Bohnenblust

612.746.3677 direct

612.816.2097mobile

mandy.bohnenblust@merjent.com



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P.O. Box 47, Waukesha, WI 53187-0047
866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

Chase Christopher
Minnesota Department of Commerce
Tribal Liaison
chase.christopherson@state.mn.us

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear Chase Christopher:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

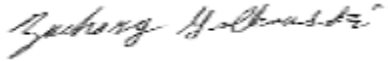
The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission’s approval process.

Cultural Resources Survey: The Applicants have contracted Merjent, Inc. to complete a Phase Ia Literature Review and a Phase I Archaeological Reconnaissance Survey.

I respectfully request your assistance with the identification of information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

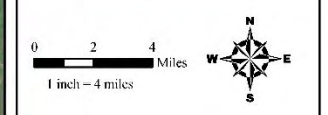
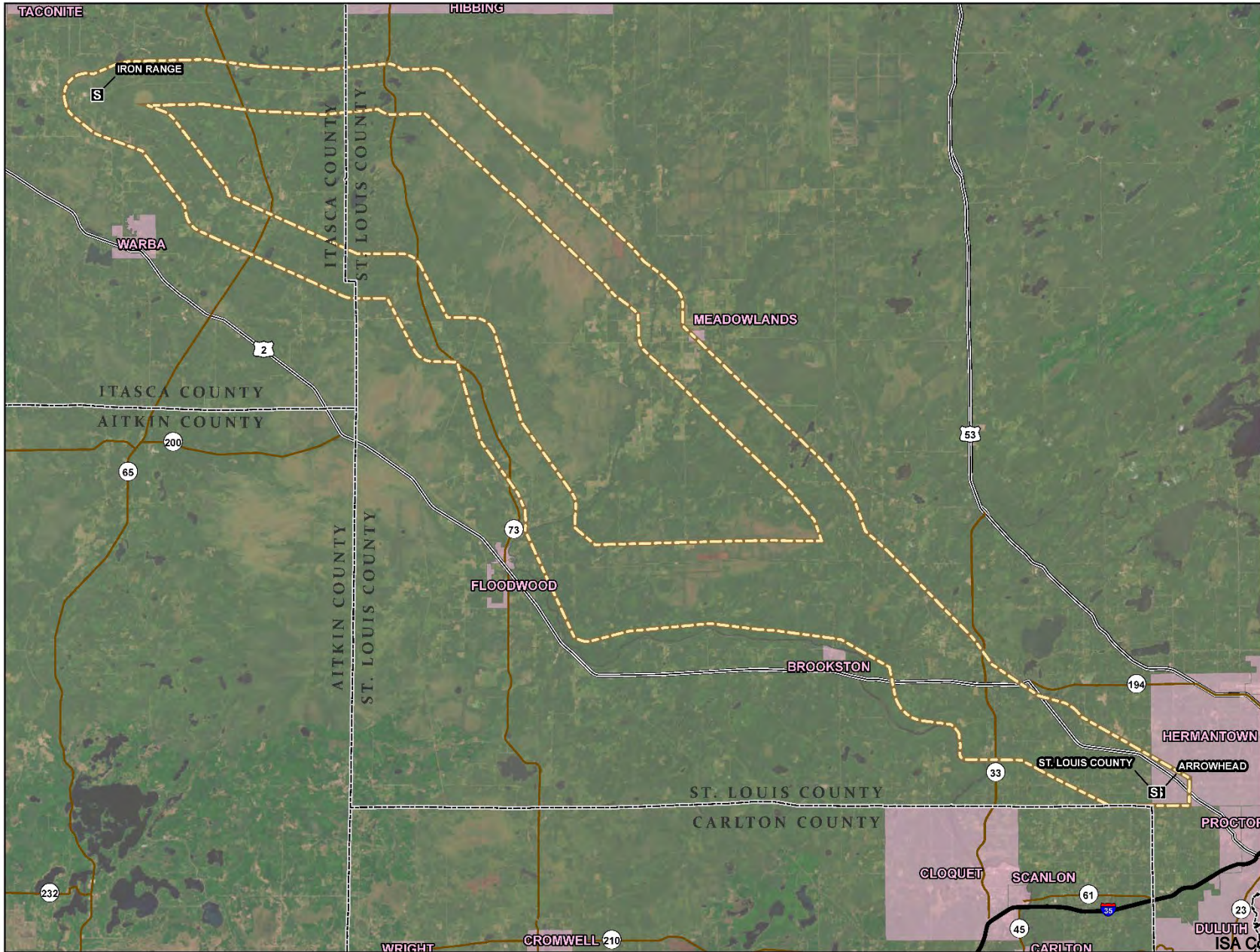
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

ISA Combined Application For Public Comment Review Purposes Only

Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 175 of 248

From: [Zach Golkowski \(MP\)](#)
To: [Goggleye Jr, George J \(MIAC\)](#); [Mandy Bohnenblust](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#)
Subject: Re: [EXTERNAL MAIL] Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Wednesday, May 7, 2025 10:25:36 AM
Attachments: [image001.png](#)
[Outlook-o2ifnr2y](#)

George,

I apologize for the delayed response.

Thank you for providing this information and MIAC Cultural Resource review form. We will complete this form then request review and/or comment.

We look forward to working with you.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Goggleye Jr, George J (MIAC) <George.Goggleye@state.mn.us>
Sent: Monday, April 21, 2025 8:13 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>
Subject: [EXTERNAL MAIL] Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

You don't often get email from george.goggleye@state.mn.us. [Learn why this is important](#)

Freeze!

[EXTERNAL EMAIL] This email was sent from someone outside the company.

Don't slip up this winter! Remember not to click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Good morning,

I have attached the MIAC Cultural Resource review form that is must be completed by the agency review. Please provide as much detail about project by using the form and attaching any additional documentation to help us complete the review in a timely manner.

Please attach this letter and send to MIAC.culturalresources@state.mn.us. The process for these requests allows for a 45 day period to complete to review.

Please feel free to contact MIAC Cultural Resources Team if you have any further questions or concerns.

Regards

George Gogleye Jr
Cultural Resource Manager
Minnesota Indian Affairs Council (MIAC)
616 Beltrami Ave Suite 170
Bemidji, MN 56601
Cell: 612-456-8028

To protect the sovereignty of the tribal nations who share geography with the state of Mni Sota and ensure the well being of all American Indian citizens throughout the state.

mn.gov/indianaffairs



From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Sent: Friday, April 18, 2025 7:13 PM

To: Gogleye Jr, George J (MIAC) <George.Gogleye@state.mn.us>

Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;
Marissa Honeycutt <marissa.honeycutt@galileoaz.com>

Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project

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George Goggeye Jr.:

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The attached letter provides additional information on the Project. The Applicants would appreciate any comments that you may have on the Project and the proposed route. Please contact Zach Golkowski at (218) 355-3366 or zgolkowski@mnpower.com should you need additional information.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power

Mandy Bohnenblust
612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

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30 West Superior Street, Duluth, MN 55802
218.864.6059 | www.mnpower.com

P.O. Box 47, Waukesha, WI 53187-0047
866.899.3204 | www.atcllc.com

April 18, 2025

VIA Email

George Goggleye Jr.
Minnesota Indian Affairs Council
Cultural Resources Manager
161 St. Anthony Ave, Ste. 919
St. Paul, MN 55103
george.goggleye@state.mn.us

**Re: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112**

Dear George Goggleye Jr.:

On February 7, 2025, Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (“ATC”) (collectively, the “Applicants”) submitted a Notice of Intent to the Minnesota Public Utilities Commission (“Commission”) to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (also the “Project” or “ISA Project”).

On December 12, 2024, the Midcontinent Independent System Operator, Inc. (“MISO”), a federally registered planning authority, approved its Long-Range Transmission Planning (“LRTP”) Tranche 2.1 portfolio of projects as part of MISO’s 2024 Transmission Expansion Plan (“MTEP24”). The LRTP Tranche 2.1 portfolio is made up of 24 projects, including project no. 21, the ISA Project. The Project involves construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County, Minnesota to Minnesota Power’s St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County, Minnesota. A map of the proposed Project Study Area is enclosed.

The Project, as part of the LRTP Tranche 2.1 portfolio, is needed to support the reliability of the regional transmission system, particularly in northern Minnesota and northwest Wisconsin to provide additional transmission capacity and regional transfer capability to reliably integrate new renewable generation, meet growing electrical demand, and to strengthen the regional transmission grid.

Two approvals must be obtained from the Commission before high voltage transmission lines and associated facilities like the proposed Project can be built: a Certificate of Need and a Route Permit. The Applicants plan to submit to the Commission a joint application for a Certificate of Need and Route Permit for the Project in accordance with Minnesota Statute § 216I in early 2026. As part of this process, the Applicants are initiating stakeholder, agency, tribal, and public outreach on the Project through letters, meetings, and open houses. At this stage in the Project development, we wanted to make you aware of the Project and to gather any information that you might have that

April 18, 2025

Page 2

will help us identify potential route options or routing constraints. We appreciate your assistance as we evaluate siting and routing information and work through the Commission's approval process.

Please let me know if you have information that the Applicants should consider in evaluating and developing potential routes for the Project. If you would like to request a meeting, please contact me at (218) 355-3366 or zgolkowski@mnpower.com. I am happy to discuss any questions that you may have about the Project.

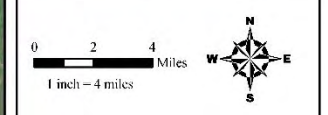
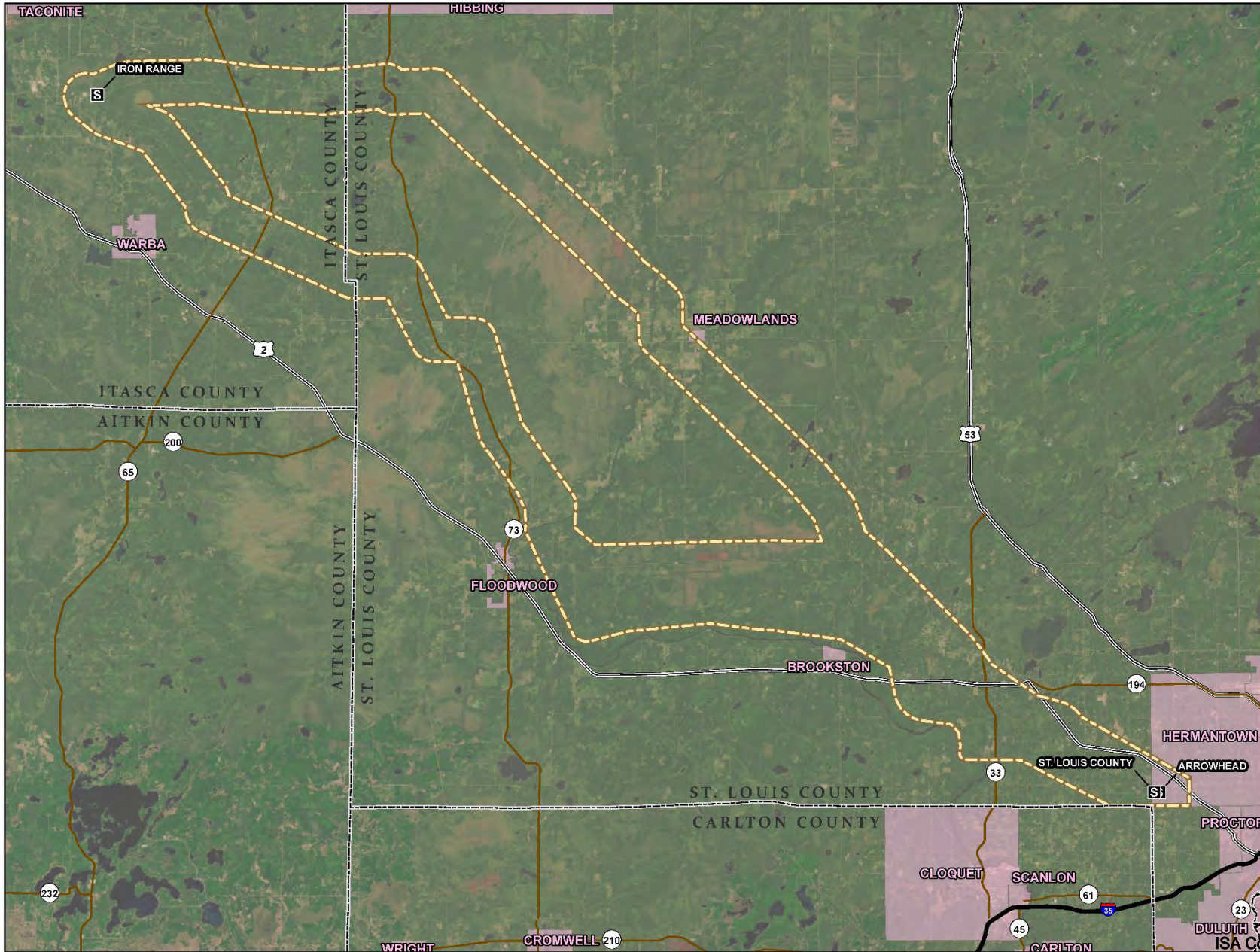
Sincerely,



Zachary Golkowski
Project Manager – Environmental
Strategic Initiatives
ALLETE Inc.

Enclosures Project Overview Map

Project Overview Map



- S** Substation
- Proposed Study Area
- City Boundary
- County Boundary

ISA Project
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Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

PROJECT REVIEW FORM

Instructions to complete the form –

Please ensure that all the fields listed with an asterisk (*) are completed before you submit your request as they are mandatory and comprise the minimum information needed for us to fulfill your request.

This is a fillable document. After completing this form, you can either save it and send it to us electronically, or you can print it, and then scan the completed form and send it to us electronically.

When you are about to send us the completed form, please feel free to add additional attachments like photos, documents etc. that are complimentary to this request.

After completing this form please send your request to: MIAC.culturalresources@state.mn.us

Data Dictionary of the form fields

Project Name – The user can add a project name for the requested review. Example: Mounds Review, Historic Property Review etc.

Project ID – The user can create a unique identifier by which MIAC &/or OSA can communicate back to the user regarding their submitted request. Example: Mounds123, HPP789 etc.

Reason for Review – The user can add the reason they are submitting the review request.

Review Type – What is the type of review you are requesting.

Funding – If there is any funding attached to your request, please mark the appropriate selection.

Organization Name – If you are associated with an organization on whose behalf you are sending this request.

Submitting Organization Type – Please select the organization type you are associated with.

Project Description – Please write a detailed description of the project you would like reviewed.

Site Numbers – If you consulted the [State Archaeologist portal](#) and your proposed project intersected any sites add the site numbers as part of your request.

County – Please add the County(s) where the project is located.

Background Research Done – If you consulted any of the systems before sending this request.

Known Resources Adjacent to Review Area – If you are aware of any known cultural resources adjacent to your project area, please mark the selection(s) appropriately.

Additional Information – If there is any other additional information, you want us to know for us to work on your request.

Location Information (PLSS) – Please add the Township, Range, Range Direction, Section for the project you are wanting us to review [Complete this or Location Information (Project Address) if PLSS is not known].

Location Information (Project Address) – If PLSS is not known for your project, enter the project's address here.

Requested By – Name of the person submitting this request [this will be used for communication purposes only].

Requestor's Email Address – Valid email of the person submitting the request [this will be used for communication purposes only].

Requestor's Phone Number – Phone number of the person submitting the request [this will be used for communication purposes only].

Requestor's Physical Address – Physical address of the person submitting the request [this will be used for communication purposes only].

Attachments - Please add any pertinent photos, maps, documents etc. to accompany your request.

REVIEW INFORMATION

1. **PROJECT NAME*:** Click or tap here to enter text.
2. **PROJECT ID:** Click or tap here to enter text.
3. **REASON FOR REVIEW*:** Click or tap here to enter text.
4. **REVIEW TYPE*:** Choose an item.
5. **FUNDING*:** Choose an item.
6. **ORGANIZATION NAME:** Click or tap here to enter text.
7. **SUBMITTING ORGANIZATION TYPE:** Choose an item.

PROJECT INFORMATION

8. **PROJECT DESCRIPTION*:** Click or tap here to enter text.
9. **SITE NUMBERS** (Can add multiples by separating numbers out with a comma): Click or tap here to enter text.
10. **COUNTY***(Add multiples by separating names out with a comma): Click or tap here to enter text.
11. **BACKGROUND RESEARCH DONE:**
 - OSA Portal Query
 - MnDOT GIS
 - MnModel
 - Legacy Historic cemeteries
12. **KNOWN RESOURCES ADJACENT TO REVIEW AREA:**
 - Cemeteries
 - Burials
 - Archaeological Sites
13. **ADDITIONAL INFORMATION:** Click or tap here to enter text.

LOCATION INFORMATION* (If there are additional PLSS entries, please add a continuation sheet)

14. LOCATION INFORMATION (Complete this or Project Address if PLSS is not known):

PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:
PLSS - Township:	Range:	Range Direction (E or W):	Section:

15. ADDRESS (if PLSS is not known, please enter your project address):

Address Line 1: Click or tap here to enter text.
 Address Line 2: Click or tap here to enter text.
 City: Click or tap here to enter text.
 State: Click or tap here to enter text.
 Zip Code: Click or tap here to enter text.

REQUESTOR INFORMATION

16. REQUESTED BY*: Click or tap here to enter text.

17. REQUESTOR'S EMAIL ADDRESS*: Click or tap here to enter text.

18. REQUESTOR'S PHONE NUMBER: Click or tap here to enter text.

19. REQUESTOR'S PHYSICAL ADDRESS:

Address Line 1: Click or tap here to enter text.
 Address Line 2: Click or tap here to enter text.
 City: Click or tap here to enter text.
 State: Click or tap here to enter text.
 Zip Code: Click or tap here to enter text.

ATTACHMENTS

Please add any pertinent photos, maps, or documents that are complimentary to the request which would assist us in fulfilling your request.

You can add attachments when you send this request electronically.

From: [Zach Golkowski \(MP\)](#)
To: [Mandy Bohnenblust](#); [Gwen Rutherford](#)
Cc: [Dan Flo](#); [Marissa Honeycutt](#); [Mike Partlow Cell](#); cmp@thepartlows.net
Subject: Re: [EXTERNAL MAIL] RE: EXTERNAL: Re: ISA Transmission Project May Open Houses
Date: Wednesday, May 7, 2025 9:26:28 AM
Attachments: [image001.png](#)

Mandy,

Thank you for getting in touch with Gwen,

Gwen,

Please feel free to give me a call if you have any questions, my contact information is below. I would be more than happy to walk you through the study area and where it intersects Trout Lake Township.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Wednesday, May 7, 2025 10:47 AM
To: Gwen Rutherford <grutherford.troutlake.twp@gmail.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>; Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Mike Partlow Cell <mike@troutlake.onmicrosoft.com>; cmp@thepartlows.net <cmp@thepartlows.net>
Subject: [EXTERNAL MAIL] RE: EXTERNAL: Re: ISA Transmission Project May Open Houses

Freeze!

[EXTERNAL EMAIL] This email was sent from someone outside the company.

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Hi Gwen,

The Study Area for the Iron Range Project includes a small portion of Trout Lake Township. Minnesota Power is soliciting feedback from the public and other stakeholders to determine a proposed route and eventually a construction footprint. Please let me know what other questions you have, and we look forward to working with the township.

Thank you,
Zach

Mandy Bohnenblust

612.746.3677 direct

612.816.2097mobile

mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

From: Gwen Rutherford <grutherford.troutlake.twp@gmail.com>

Sent: Tuesday, May 6, 2025 8:22 PM

To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Dan Flo <dan.flo@merjent.com>;

Marissa Honeycutt <marissa.honeycutt@galileoaz.com>; Mike Partlow Cell

<mike@troutlake.onmicrosoft.com>; cmp@thepartlows.net

Subject: EXTERNAL: Re: ISA Transmission Project May Open Houses

CAUTION: This email originated from outside of Merjent.

RE: TROUT LAKE TOWNSHIP

Mandy:

Is the ISA Transmission Project route in Trout Lake Township?

Thank you in advance.

Gwen Rutherford

Clerk, Trout Lake Township

On Tuesday, May 6, 2025, Mandy Bohnenblust <mandy.bohnenblust@merjent.com> wrote:

Minnesota Power is hosting Open Houses to introduce the ISA Transmission Project. The proposed ISA Transmission Project is an approximately 63-mile-long 345 kilovolt transmission line between Minnesota Power's Iron Range Substation near Grand Rapids in Itasca County, Minnesota Power's St. Louis County Substation, and American Transmission Company's Arrowhead Substation near Hermantown, Minnesota.

Minnesota Power invites you to attend any of the Open Houses; the schedule is as follows:

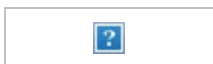
Tuesday, May 20	Wednesday, May 21	Thursday, May 22
1:00-3:00 PM Yanmar Arena 1401 NW 3rd Avenue Grand Rapids, MN 55744	5:00-8:00 PM Floodwood Event Center 201 W 7th Avenue Floodwood, MN 55736	12:00-2:00 PM Hermantown Government Center/City Hall – Training Center 5105 Maple Grove Road Hermantown, MN 55811
5:00-8:00 PM Meadowlands Community Center 7758 Western Avenue Meadowlands, MN 55765		5:00-8:00 PM Solway Town Hall 4029 Munger Shaw Road Cloquet, MN 55720

[Minnesota](#) Power is seeking your input on the proposed routes and study area for the Project. If you have questions about the Project or the Open Houses, please contact Zach Golkowski, (218) 355-3366 or zgolkowski@mnpower.com.

Regards,
Mandy Bohnenblust on behalf of
Zach Golkowski
Project Manager – Environmental
Minnesota Power/ALLETE, Inc.

Mandy Bohnenblust

612.746.3677 direct
612.816.2097 mobile
mandy.bohnenblust@merjent.com



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--

Gwen Rutherford
Clerk/Trout Lake Township

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Iron Range – St. Louis County – Arrowhead ISA TRANSMISSION PROJECT



OPEN HOUSE DETAILS

TUESDAY, MAY 20, 1:00-3:00PM

Yanmar Arena
1401 NW 3rd Avenue
Grand Rapids, MN 55744

TUESDAY, MAY 20, 5:00-8:00PM

Meadowlands Community Center
7758 Western Avenue
Meadowlands, MN 55765

WEDNESDAY, MAY 21, 5:00-8:00PM

Floodwood Event Center
201 W 7th Avenue
Floodwood, MN 55736

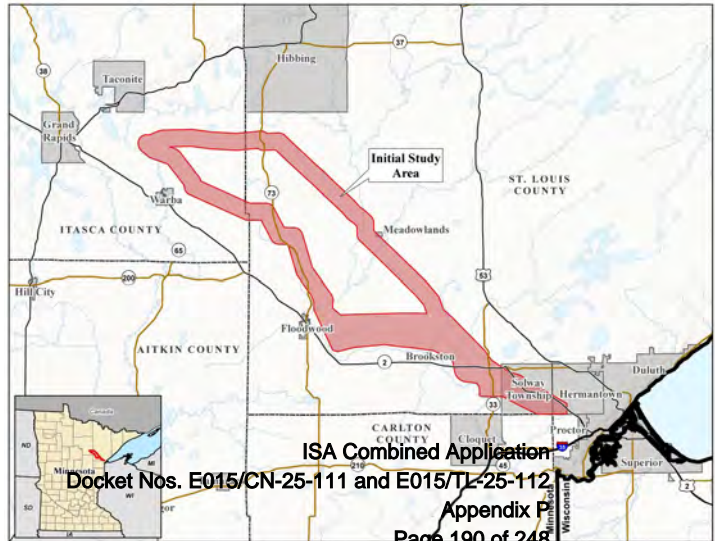
THURSDAY, MAY 22, 12:00-2:00PM

Hermantown Government Center/
City Hall – Training Center
5105 Maple Grove Road
Hermantown, MN 55811

THURSDAY, MAY 22, 5:00-8:00PM

Solway Town Hall
4029 Munger Shaw Road
Cloquet, MN 55720

Join Minnesota Power at one of the Open Houses to learn more about the ISA Transmission Project and provide comments.



From: [Zach Golkowski \(MP\)](#)
To: Mary_Emanuel@fws.gov
Cc: [Mandy Bohnenblust](#); [Dan Flo](#); [Marissa Honeycutt](#)
Subject: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Date: Wednesday, May 7, 2025 10:45:39 AM

Hi Mary,

Thank you for responding with detailed information regarding migratory birds and eagle take permits. At this time, the ISA Project is currently in the early stages of development and we have identified a Study Area that we are evaluating for potential routing opportunities. We are currently requesting feedback from local, state, and federal agencies regarding the Study Area and are planning a number of open houses to facilitate additional feedback from the public.

Environmental surveys, including raptor nest surveys, will be completed in 2026. The Applicants will coordinate with FWS, as necessary, regarding migratory birds and/or eagles. We look forward to any additional feedback you have

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

Hi Mandy,

The Service has a library of resources that contain best practices and ways to minimize impacts on migratory birds. The resource here, <https://www.fws.gov/story/avoidance-and-minimization-measures-power-lines> specifically addresses power lines and contains links to other helpful documents.

For eagles, site visits are always recommended to determine whether or not eagles could be nesting in the area where the activity is occurring, which could impact whether a disturbance permit is recommended or not.

The Service has two types of Eagle Disturbance Take Permits ([General](#) and [Specific](#)) that can be issued when it is possible that an activity occurring near a nest could disturb the eagles according to the definition in the [Bald and Golden Eagle Protection Act](#). If an activity is more than 660' from a bald eagle nest, a permit will not be recommended except in very special circumstances. When there is an activity occurring within 660' of a bald eagle nest, the Service has [disturbance permit guidelines](#) that can help determine if a permit could be recommended.

General permits are administered by the Migratory Bird Program at Headquarters. To receive a general permit an entity must register in ePermits, certify that they meet all issuance and eligibility criteria, agree to the most recent standard permit conditions ([General Permit Standard Conditions - Bald Eagle Nest Disturbance | FWS.gov](#)), complete the online application form, and pay their permit fees through ePermits, which will direct a registrant to make a payment via Pay.gov. We cannot accept checks for General Permits. General permit applicants must also

certify that they meet the issuance criteria specified in [50 CFR 22.210](#). If it will not be possible to follow the General Permit standard conditions, or issuance criteria, a Specific Permit will be recommended. A single General Permit cannot be issued for multiple nests.

Please note, the General Permits are valid for up to 12 months (Sept 1-August 31), Specific Permits are valid for up to 5 years. An applicant may request a Specific Permit if they would like a longer permit tenure. While a permit is valid, there is also a required annual report documenting the eagle's occupation of the nest and nesting success, regardless of which permit type someone gets.

Thank you,

Mary Emanuel
Wildlife Biologist, Permitting
USFWS, Region 3, Migratory Birds Permit Office
5600 American Blvd. W, Suite 990
Bloomington, MN 55437
(612) 713-5441
Mary_Emanuel@fws.gov

From: [Zach Golkowski \(MP\)](#)
To: [Mandy Bohnenblust](#); [Dan Flo](#); [Marissa Honeycutt](#)
Subject: ACOE Correspondence - Jeremy Kinney
Date: Monday, May 12, 2025 8:34:28 AM

Hello all,

Last Friday I spoke with Jeremy Kinney with the Army Corps of Engineers. Jeremy reached out in regards to the ISA project with some standard questions and comments.

I spoke with Jeremy after a different meeting and we talked about the project being in the infancy stages and we had no real data for him at this time. I suggested getting a meeting on the calendar to walk him through the project and he was receptive.

However, per executive order, Jeremy is required to move to Duluth with his family as this will be his main office. They will be doing that over the next two weeks starting mid May. He suggested that we schedule a meeting sometime in early June to walk through the project.

He also mentioned that we should include him on all correspondence for ISA, but also said that we should include the MN ACOE contact information at the beginning to make sure that we are not missing someone. Ben Orne may also want to be included and this would make sure that we cover all of our bases.

Please let me know if you have any questions.

Thank you,

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

O: 218-355-3366

C: 218-428-5582

From: Weston, Isaac (He/Him/His) (MIAC) <Isaac.Weston@state.mn.us>
Sent: Tuesday, September 23, 2025 9:45 AM
To: Zach Golkowski (MP) <zgolkowski@mnpower.com>
Subject: [EXTERNAL MAIL] ISA Transmission Project

You don't often get email from isaac.weston@state.mn.us. [Learn why this is important](#)

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Before
You Click

[EXTERNAL EMAIL] This email was sent from someone outside the company.

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Hello Zach,

Attached is the review for the ISA Transmission Project. Please don't hesitate to reach out if there are any questions or concerns that arise.

Thank you,

Isaac J. Weston
Cultural Resource Manager
Minnesota Indian Affairs Council
161 Rondo Avenue, Ste. 919
Saint Paul, MN 55103
612-512-8391
isaac.weston@state.mn.us
Mn.gov/indianaffairs



161 Rondo Ave, Suite 919 Saint Paul, MN 55103
MIAC.Culturalresources@state.mn.us

Date: 09/23/2025

Zach Golkowski
 Minnesota Power
 2183553366
 zgolkowski@mnpower.com

Project Name: ISA
 Transmission
 Project

Submitter's MPUC Docket Nos. E015/CN-25-
Project ID: 111 and E015/TL-25-112

Known or Suspected Cemeteries
<input type="checkbox"/> Platted Cemeteries <input type="checkbox"/> Unplatted Cemeteries <input type="checkbox"/> Burial File <input type="checkbox"/> Authenticated Burial
Notes/Comments
<p>Thank you for the opportunity to comment on the above listed project. I have reviewed this project pursuant to the responsibilities given to the Minnesota Indian Affairs Council by the Private Cemeteries Act (Minn. Stat. § 307.08), and the Minnesota Field Archaeology Act (Minn. Stat. § 138.31-.42). There are no known or suspected burial sites that may be affected by this project. At this time, MIAC recommends a Phase I archaeological survey and tribal involvement should occur prior to any ground disturbance. Please have an Inadvertent Discovery Plan in place. If human remains are found during ground disturbing activities, immediately contact law enforcement.</p>
Recommendations

- Not Applicable
- No Concerns
- Monitoring
- Avoidance
- Phase Ia – Literature Review
- Phase I – Reconnaissance survey
- Phase II – Evaluation
- Phase III – Data Recovery
- Other - Tribal Involvement, develop inadvertent discovery plan

If you require additional information or have questions, comments, or concerns please contact our office.

Sincerely,

Isaac Weston
Cultural Resource Manager
Minnesota Indian Affairs Council
161 Rondo Avenue, Ste. 919
Saint Paul MN 55103
612-512-8391
isaac.weston@state.mn.us

From: Harrington, Lucy (She/Her/Hers) (ADM) <Lucy.Harrington@state.mn.us>
Sent: Monday, October 6, 2025 4:39 PM
To: Kevin Mieras <kevin.mieras@merjent.com>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Drew Janke (MP) <djanke@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Jo Render <jo.render@merjent.com>; Marissa Honeycutt <marissa.honeycutt@merjent.com>
Subject: EXTERNAL: RE: SHPO Review and Comment Request - Great River Energy - LR-PC 115-kV Transmission Line Rebuild Project

CAUTION: This email originated from outside of Merjent.

Find attached MN SHPO's comment in response to request dated 9/2/25.

Lucy Harrington (she/her) | Environmental Review Archaeologist

State Historic Preservation Office
Minnesota Department of Administration
50 Sherburne Avenue, Suite 203
Saint Paul, Minnesota 55155
(651) 201-3283 | lucy.harrington@state.mn.us

From: Kevin Mieras <kevin.mieras@merjent.com>
Sent: Tuesday, September 2, 2025 2:55 PM
To: MN_ADM_ENV Review SHPO <ENReviewSHPO@state.mn.us>
Cc: Zach Golkowski (MP) <zgolkowski@mnpower.com>; Drew Janke (MP) <djanke@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Jo Render <jo.render@merjent.com>; Marissa Honeycutt <marissa.honeycutt@merjent.com>
Subject: SHPO Review and Comment Request - Great River Energy - LR-PC 115-kV Transmission Line Rebuild Project

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Dear Leslie Coburn,

Minnesota Power and American Transmission Company LLC by and through its corporate manager ATC Management Inc. (Applicants) are proposing to construct approximately 62 miles of new 345 kilovolt (kV) transmission line from Itasca County, Minnesota to St. Louis County, Minnesota, referred to as the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project (also the Project or ISA Project). Minnesota Power plans to submit a joint application for a Certificate of Need and Route Permit for the Project to the Minnesota Public Utilities Commission in February 2026.

The Phase Ia literature review report, found at the OneDrive link below, provides additional information on the Project and a review of the cultural resources within 1-mile of the Project that are on file with the State Historic Preservation Office and the Office of the State Archaeologist. The Applicants would appreciate any comments and recommendations that you may have on the Project and the proposed route. Please contact me at (612) 558-6982 or kevin.mieras@merjent.com should you need additional information or have any issues with the link below.



OneDrive Link:  [Review and Comment Request_ISA Project_20250902](#)

Thank you,

Kevin Mieras

612.924.3978 direct

612.558.6982 mobile

kevin.mieras@merjent.com



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660

www.merjent.com

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October 6, 2025

Kevin Mieras
Merjent, Inc.
kevin.mieras@merjent.com

RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Itasca and Saint Louis Counties
SHPO Number: 2025-1708

Dear Kevin Mieras:

Thank you for providing information about the proposed project referenced above. We understand that Minnesota Power and American Transmission Company, LLC are proposing a transmission line and substation expansions that will be permitted through the Minnesota Public Utilities Commission.

Due to the nature and location of the proposed project, we recommend that an archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking such surveys, please visit the website www.mnhs.org/preservation/directory, and select "Archaeologists" in the "Specialties" box. We will reconsider the need for survey if the project area can be documented as previously surveyed or disturbed. Any previous survey work must meet contemporary standards. **Note:** plowed areas and existing right-of-way are not automatically considered disturbed. Archaeological sites can remain intact beneath the plow zone and in undisturbed portions of the right-of-way.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

Please submit additional information via email to ENReviewSHPO@state.mn.us and reference SHPO # 2025-1708 in the subject line of your email and in your cover letter. Please submit the requested archaeological survey using the Office of the State Archaeologist's Portal as described on our website. If you have any questions regarding our review of this project, please contact Lucy Harrington, Environmental Review Archaeologist, at lucy.harrington@state.mn.us.

Sincerely,



Amy Spong
Deputy State Historic Preservation Officer

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

mn.gov/admin/shpo ■ mnsupo@state.mn.us

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

ISA Combined Application
Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 199 of 248

From: [Drew Janke \(MP\)](#)
To: elmertownship@outlook.com
Cc: [Jo Render](#); [Marissa Honeycutt](#); [Amber Lyons](#)
Subject: EXTERNAL: MN Power ISA Transmission Project Map - Elmer Township
Date: Tuesday, October 14, 2025 3:43:18 PM
Attachments: [ISA - Elmer Township.pdf](#)

CAUTION: This email originated from outside of Merjent.

Good evening Patti,

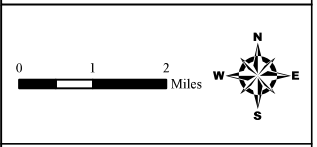
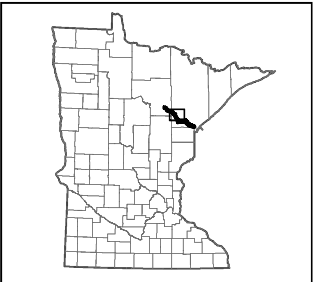
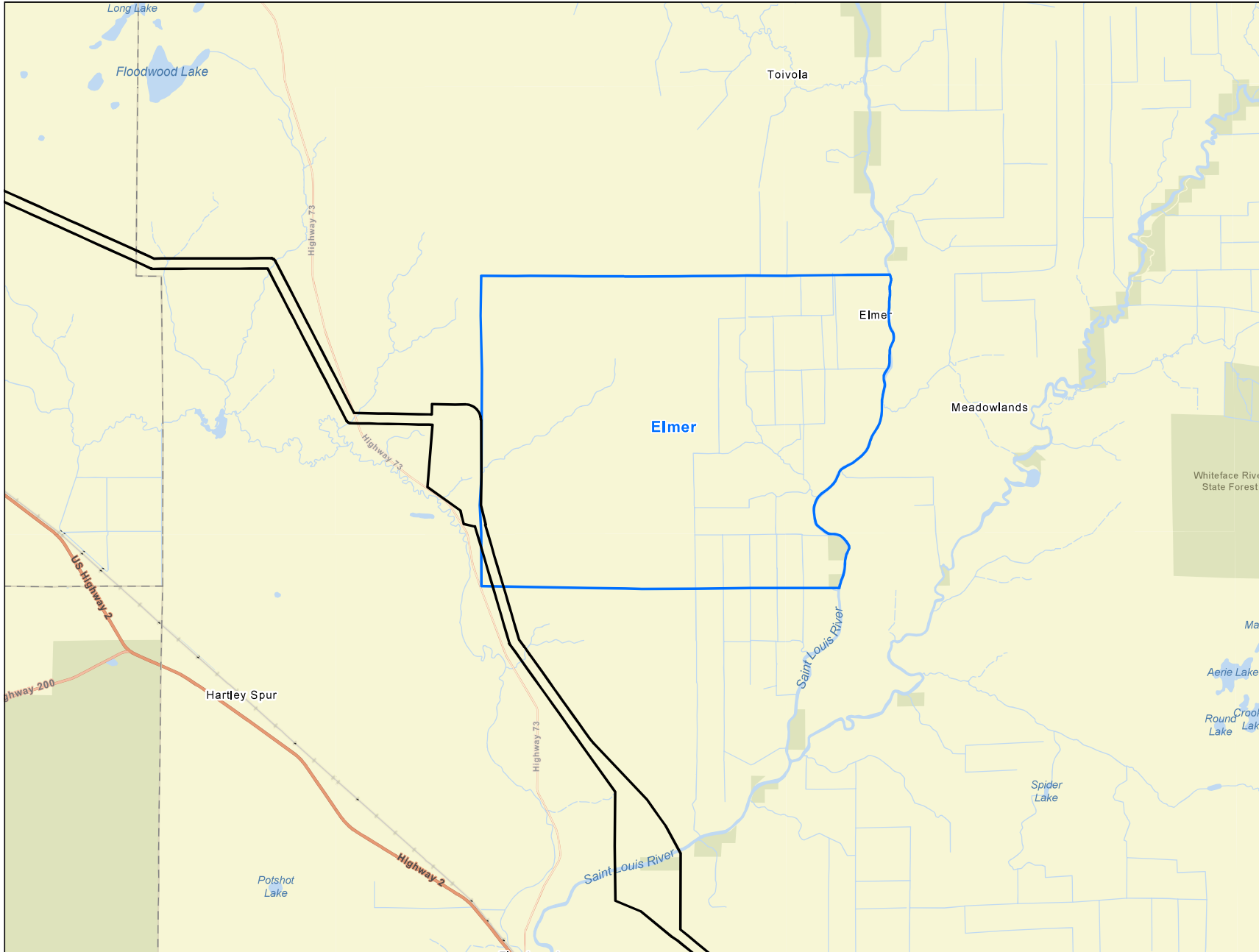
It was great to meet you and the rest of the township board this past Saturday. As discussed, please see the attached map of the ISA Project preliminary route that passes through the SW portion of Elmer Township.



Let me know if you have any questions!

Thank you,
Drew

Drew Janke
Environmental Compliance Specialist Senior
Minnesota Power | ALLETE, Inc.
30 West Superior Street
Duluth, MN 55802

O: 218-355-3569
C: 218-576-9213




-  Preliminary Route
-  Township Boundary

**ISA Transmission
Line Project**

Preliminary Route

Elmer Township



For Environmental Review Purposes Only

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Thursday, November 20, 2025 10:36 AM
To: Parson, Jessica (DNR) <jessica.parson@state.mn.us>; Drew Janke (MP) <djanke@mnpower.com>
Cc: Means, Angela (DNR) <Angela.Means@state.mn.us>; Marrier, Amy (DNR) <amy.marrier@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; Weitzel, Julie (DNR) <Julie.Weitzel@state.mn.us>
Subject: RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

Good morning,

Thank you again for taking the time to meet with us regarding the proposed ISA Transmission Line Project and possible crossings of LAWCON lands. As discussed, attached is a shapefile of the proposed route, and an updated excel sheet indicating which parcels are in the proposed route and which are not. We would appreciate the DNR's additional review of these parcels to confirm their LAWCON status. In the meantime, Minnesota Power will be reviewing their existing leases within these parcels.

Please let us know when you're ready for additional discussions and we'll let you know when we've completed the review of the lease agreements.

Thank you again,
Mandy

Mandy Bohnenblust
612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

From: Parson, Jessica (DNR) <jessica.parson@state.mn.us>
Sent: Tuesday, October 28, 2025 12:09 PM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Drew Janke (MP) <djanke@mnpower.com>
Cc: Means, Angela (DNR) <Angela.Means@state.mn.us>; Marrier, Amy (DNR) <amy.marrier@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; Weitzel, Julie (DNR) <Julie.Weitzel@state.mn.us>
Subject: RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

Good afternoon,

Would any of these work for a conversation with the divisions of Lands and Minerals and Forestry regarding the LAWCON Lands? Looks like these are the soonest times where we are all available. I copied our team on this email.

November 4th 9-10am, or 2:30-3:30pm
November 5th 8:30-9:30am

Thanks,

Jessica Parson

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Minnesota Department of Natural Resources

4805 Rice Lake Rd
Duluth, MN 55803

Phone: 218-328-8826

Email: Jessica.Parson@state.mn.us
mndnr.gov



From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Tuesday, October 28, 2025 8:32 AM
To: Parson, Jessica (DNR) <jessica.parson@state.mn.us>; Drew Janke (MP) <djanke@mnpower.com>
Cc: Speldrich, Bri (DNR) <Brianna.Speldrich@state.mn.us>; Wilfond, Dan (DNR) <dan.wilfond@state.mn.us>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>

Subject: RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

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Hi Jessica,

Thank you for following up on our conversation regarding the ISA project and specifically the crossing of West Rocky Run. The Project does need to connect Minnesota Power's St. Louis County Substation with ATC's Arrowhead Substation. The line will enter ATC's Arrowhead Substation directly from the south side of the substation to connect to the new electrical equipment being installed at the south of the substation as part of the Project. The current Proposed Route in this area is relatively wide, allowing for flexibility in selecting the crossing location.

Due to a number of factors, such as maintenance considerations, heat dissipation, and much higher costs, placing 345-kV electrical transmission lines underground is typically impractical and not being considered for the ISA Project.

At this time, we are planning to submit an application to the PUC in December 2025, which will include a Proposed Route and a Preliminary Alignment. The PUC will only approve a route, not an alignment, so we would be happy to continue the conversation regarding the alignment across West Rocky Run with the DNR and specifically the fisheries staff. Would it make the most sense to have additional conversations after the application has been submitted and reviewed by the DNR? Alternatively, we would be happy to meet at any time to discuss the project and the crossing of West Rocky Run.

Thank you again for the detailed response and information.

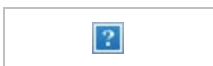
Mandy

Mandy Bohnenblust

612.746.3677 direct

612.816.2097mobile

mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414

From: Parson, Jessica (DNR) <jessica.parson@state.mn.us>
Sent: Tuesday, October 21, 2025 10:01 AM
To: Drew Janke (MP) <djanke@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Speldrich, Bri (DNR) <Brianna.Speldrich@state.mn.us>; Wilfond, Dan (DNR) <dan.wilfond@state.mn.us>; Bump, Samantha (DNR) <samantha.bump@state.mn.us>
Subject: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

CAUTION: This email originated from outside of Merjent.

Hi Drew and Mandy,

As mentioned previously in early coordination discussions for the Arrowhead 345 ISA project, there are several very sensitive cold-water (native, naturally reproducing Brook Trout) resources that the project appears to cross. We largely support that all water crossings plan to be spanned crossings, or in some cases bored underground. While the practice of spanning power lines over waterways largely avoids direct in-stream impacts, they are impactful to cold-water resources through changes on the surrounding riparian ecosystem.

The loss of the forest canopy associated with span crossings directly increases water temperatures, which can be lethal to cold-water fish and other aquatic life. The most effective mitigation strategy would be to avoid working in these sensitive areas completely. If this is not feasible, other strategies such as increasing span length and decreasing the frequency of tower structures while also minimizing existing vegetative removal may be considered as effective mitigation techniques on a case-by-case basis. For special very sensitive resources in the proper scenario, it may be least impactful to cross these waterways via underground or directional boring of utilities rather than spanning. Additional study is suggested to focus on minimizing impacts to high quality Brook Trout stream resources within the utility corridor such as West Rocky Run Creek (S-2-10-3). The proximity of this stream to the substation in Hermantown has led to several stream crossings by transmission lines and impacted this stream's riparian area.

The HVDC modernization project that was recently reviewed near the Hermantown substation generated a lot of discussion and creative problem solving to reduce impacts to the riparian zone along West Rocky Run. We will need to continue thoughtful coordination as trout stream crossings are planned and impacts are minimized.

We appreciate the early and consistent engagement on this project, and hope to continue to coordinate and reduce trout stream impacts. I added our fisheries specialist; Dan Wilfond and our Area Hydrologist in this area Bri Speldrich to this email in addition to our energy project planner Samantha Bump. Feel free to reach out to us as you work through avoidance and

minimization. Additionally, please let me know if you would like to schedule a meeting to discuss this further.

Thank you,

Jessica Parson

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Minnesota Department of Natural Resources

4805 Rice Lake Rd

Duluth, MN 55803

Phone: 218-328-8826

Email: Jessica.Parson@state.mn.us
mndnr.gov



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From: [Kotch Egstad, Stacy \(DOT\)](#)
To: [Angie Ronayne](#)
Cc: [Drew Janke \(MP\)](#); [Mandy Bohnenblust](#); [Marissa Honeycutt](#)
Subject: RE: ISA MnDOT ENM package upload
Date: Monday, November 24, 2025 11:27:19 AM
Attachments: [image001.png](#)

Received! Thank you, Angie.

Everything seemed to come through without issue.

I will prep this for internal distribution/review and send it out after the holiday weekend. The 30-day internal review timeline would commence and, dependent on your RPA submittal timeline to the Commission, a formal letter will be sent to you or uploaded to the EIP docket.

I will reach out should any reviewers need additional information or clarification on the information provided.

Thank you again.

Regards,

Stacy Kotch Egstad

Utility Routing & Siting Coordinator | Office of Land Management

Minnesota Department of Transportation

395 John Ireland Blvd Mailstop 678

St. Paul, MN. 55155

651-358-0786



From: Angie Ronayne <angie.ronayne@merjent.com>
Sent: Monday, November 24, 2025 9:59 AM
To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>
Cc: Drew Janke (MP) <djanke@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Marissa Honeycutt <marissa.honeycutt@merjent.com>
Subject: ISA MnDOT ENM package upload

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Good morning, Stacy-

Thank you for providing a shared folder. I have uploaded the ISA 345 kV Early Notification Memo

(ENM) package. Please let us know if you have any questions or need any additional information as you review the ENM.

Best,
Angie

Angie Ronayne, PE (she/her)
612.746.3669 direct
763.234.8421 mobile
angie.ronayne@merjent.com

From: Filetransfer.mn.gov <filetransfer@state.mn.us>
Sent: Monday, November 24, 2025 9:31 AM
To: Angie Ronayne <angie.ronayne@merjent.com>
Subject: EXTERNAL: You've been added to a workspace

CAUTION: This email originated from outside of Merjent.

Hi angie.ronayne@merjent.com,

Stacy Kotch Egstad invited you to a shared folder called ISA
345KV ENM.

Please use this to upload the ISA ENM package.
This message was sent from the State of Minnesota Secure File
Transfer Protocol service.

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From: "Drew Janke (MP)" <djanke@mnpower.com>
Sent: Wednesday, November 26, 2025 10:38 AM
To: Roos, Stephan (MDA)
Cc: Kirsch, Raymond (COMM); Lennon, Megan (MDA); Mandy Bohnenblust; Jim Atkinson (MP)
Subject: EXTERNAL: RE: [EXTERNAL MAIL] RE: MN Power ISA Transmission Project - AIMP

CAUTION: This email originated from outside of Merjent.

Good morning Steve,

Thank you for taking the time to review the potential ISA area and for providing the helpful feedback – the rationale makes sense on our end.

We'll plan to develop an AIMP for the project and will reach out if we have any questions.

Thank you and hope you have a Happy Thanksgiving!

Drew

Drew Janke
Environmental Compliance Specialist Senior
Minnesota Power | ALLETE, Inc.
30 West Superior Street
Duluth, MN 55802

O: 218-355-3569
C: 218-576-9213

From: Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Sent: Monday, November 24, 2025 10:48 AM
To: Drew Janke (MP) <djanke@mnpower.com>

Cc: Kirsch, Raymond (PUC) <raymond.kirsch@state.mn.us>; Lennon, Megan (MDA) <Megan.Lennon@state.mn.us>

Subject: [EXTERNAL MAIL] RE: MN Power ISA Transmission Project - AIMP

Freeze!

[EXTERNAL EMAIL] This email was sent from someone outside the company.

It may be cold out, but cyber-attacks don't slow down! Remember to freeze, think twice, and never click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Hi Drew,

Sorry for the delay in responding. It's not because I didn't catch your message last week, I was doing a desktop survey and actually tried to trace the proposed route on aerial maps to see the potential for impact to ag lands. Based on the rather generalized map from you that I have available (totally understandable at this point), it was a bit challenging.

I do realize that there won't be much ag land impact overall, but the real issue we face at MDA is changing the precedent of our approach to 345kV lines – these really do catch the attention of the public, including the ag community, and we can't realistically treat a few farmers differently than a lot of farmers by dismissing the need for an AIMP.

By this point, AIMPs are fairly standardized and not especially difficult to produce, especially if there aren't any special conditions such as irrigation systems potentially impacted by interference or dairy operations potentially impacted by stray voltage. I didn't find either of these potential issues within the route corridor. I can't determine if any of the ag operations within the corridor are organic so I believe you are correct in assuming there are none.

So, at this point I'm inclined to require a standard AIMP for the project. It would memorialize the treatment and mitigation measures for ag land much better than permit conditions placed by the PUC. It would also serve as good PR in general, and especially to any farmers you need to interact with no matter how few. I'm not at all concerned if you want to wait a bit on preparing the AIMP to see if the final route avoids any agricultural land. My all-be-it quick desktop survey indicates that it might be possible, and the AIMP isn't due until the route approval is passed by the PUC.

If you want to discuss this, feel free to reach out to me and we can set up a call,
Steve

Steve Roos
Environmental Planner
Agricultural Marketing and Development Division

625 Robert Street North
Saint Paul, MN 55155-2538
O: 651-201-6631
C: 612-968-7208



From: Drew Janke (MP) <djanke@mnpower.com>
Sent: Wednesday, November 19, 2025 2:52 PM
To: Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Cc: Jim Atkinson (MP) <jbatkinson@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Subject: RE: MN Power ISA Transmission Project - AIMP

You don't often get email from djanke@mnpower.com. [Learn why this is important](#)

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Good afternoon Stephan,

Checking in to see if you've had a chance to review our below approach to not preparing an AIMP for the proposed ISA Transmission Line project. Please let me know if you have any questions or if it would be helpful to set up a discussion.

Thank you,
Drew

Drew Janke
Environmental Compliance Specialist Senior
Minnesota Power | ALLETE, Inc.
30 West Superior Street
Duluth, MN 55802

O: 218-355-3569
C: 218-576-9213

From: Drew Janke (MP)
Sent: Monday, October 13, 2025 1:29 PM
To: 'stephan.roos@state.mn.us' <stephan.roos@state.mn.us>
Cc: Jim Atkinson (MP) <JBATKINSON@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Subject: MN Power ISA Transmission Project - AIMP

Good afternoon Stephan,

Minnesota Power is proposing to construct the Iron Range – St. Louis County – Arrowhead 345 kilovolt (kV) Transmission Project (“ISA Project”) and initially provided a project introduction letter on April 18, 2025 (attached) to the MDA. Minnesota Power is planning to submit a Certificate of Need and Route Permit application to the Minnesota in December 2025. According to National Land Cover Database (“NLCD”) data, the Proposed Route includes about 64 acres of cultivated cropland and 509 acres of pasture/hay lands, and the right-of-way includes approximately 8.4 acres of cultivated cropland and 59.6 acres of pasture/hay lands. In addition, according to the Minnesota Department of Agriculture (“MDA”) Organic Farm Directory, no registered organic producers are within the Proposed Route.

During construction, the proposed transmission structure locations will need to be accessed to install the structures and again to string conductors. Equipment used during construction will include backhoes, cranes, boom trucks, and assorted small vehicles. Operation of this equipment on adjoining farm fields can cause rutting and soil compaction, particularly during springtime and otherwise wet conditions. In the event drain tile is present in the project area, it may be impacted during construction and structure installation. Agricultural land could be temporarily taken out of production during construction; however, farming would resume after restoration is complete. Only structure locations (and associated guy wires, if present) would be precluded from future farming activities. These impacts could cause crop losses.

Based on a review of aerial photos and desktop information, the Proposed Alignment will not cross the edge of center-pivot irrigated fields. However, if center-pivot irrigated fields are identified during land acquisition, the Minnesota Power will work with the landowner to minimize impacts. The Applicants will work with landowners once a final route and alignment are permitted, to the extent practicable, to coordinate the need for any early harvest of crops that may be necessary. Applicants will work with landowners to minimize impacts on agricultural activities and will compensate the landowner for any crop damage or losses. Areas disturbed during construction will be repaired and restored to pre-construction conditions as required so that all surfaces drain naturally, blend with the natural terrain, and are left in a

condition that will facilitate crop production or natural revegetation, provide for proper drainage, and prevent erosion.

Based on the limited impact anticipated to agricultural land, Minnesota Power does not anticipate preparing an Agricultural Impact Mitigation Plan for the ISA Project. We would be happy to have a call to discuss the Project in more detail and to obtain MDA's concurrence, in writing, that an AIMP is not necessary for this project.

We look forward to hearing from you. Please let me know if you have any questions.

Thank you,
Drew

Drew Janke
Environmental Compliance Specialist Senior
Minnesota Power | ALLETE, Inc.
30 West Superior Street
Duluth, MN 55802

O: 218-355-3569
C: 218-576-9213

From: Drew Janke (MP) <djanke@mnpower.com>
Sent: Thursday, December 11, 2025 3:26 PM
To: Means, Angela (DNR) <Angela.Means@state.mn.us>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Cc: Marrier, Amy (DNR) <amy.marrier@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; Weitzel, Julie (DNR) <Julie.Weitzel@state.mn.us>; Parson, Jessica (DNR) <jessica.parson@state.mn.us>
Subject: RE: [EXTERNAL MAIL] RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

Good afternoon Angela,

Thank you again for the initial review of potential LAWCON lands within the proposed route of the ISA Project. As discussed, we reviewed the easement rights associated with the potential LAWCON parcels – please see the summary below and the associated warranty deeds attached.

Parcels near the Cloquet River:

Parcel IDs: 400-0010-03430 & 400-0010-03380
NW ¼ SW ¼ Township 51N, Range 17W, Section 20

The interest reserved within the warranty deed for these parcels is 330 feet in width. At the time of conveyance, this 330-foot-wide interest included the rights of way for the existing 230 kV line (98 Line), existing 115 kV line (9 Line) and a speculative “future” line, as depicted in drawings MA-3722, MA-3723 & MA-3724 on pages 13, 14 & 15 of the attached Cloquet River Warranty Deed PDF, respectively. The speculative “future” line was reserved on the northeast side of the existing 115 kV line (9 Line); however, the ISA Project is proposing to overtake the existing 230 kV line (98 Line) and expand the existing right of way to the southwest by twenty feet.

Parcel ID: 400-0010-05000

NW ¼ NW ¼ Township 51N, Range 17W, Section 29

There was no existing transmission line through this parcel at the time of conveyance, and no land rights were reserved for this parcel. While this parcel is within the proposed route for the ISA Project, we do not anticipate it being impacted by actual construction if the proposed overtaking of the existing 230 kV line (98 Line) is approved.

Parcels near the St. Louis River:

Parcel ID: 555-0010-05610

NW ¼ NW ¼ Township 52N, Range 20W, Section 34

The interest reserved within the warranty deed for this parcel is 230 feet in width. At the time of conveyance, this 230-foot-wide interest included the right of way for the existing 230 kV line (98 Line) and a speculative “future” line, as depicted in drawing MA-25226 on page 18 of the attached St. Louis River Warranty Deed PDF. The speculative “future” line was reserved on the east side of the existing 230 kV line (98 Line), which the ISA Project is proposing to overtake.

Parcel ID: 555-0010-05570

NW ¼ NE ¼ Township 52N, Range 20W, Section 34

There was no existing transmission line through this parcel at the time of conveyance, and no land rights were reserved for this parcel. While this parcel is within the proposed route for the ISA Project, we do not anticipate it being impacted by actual construction if the overtake of the existing 230 kV line (98 Line) is approved.

Please also see attached again a shapefile of the proposed route and the revised table that only includes parcels within the proposed route. We’d appreciate the DNR’s review of these parcels to confirm their LAWCON status.

Please reach out with any questions and thank you in advance.

Drew Janke

Environmental Compliance Specialist Senior
Minnesota Power | ALLETE, Inc.
30 West Superior Street
Duluth, MN 55802

O: 218-355-3569

C: 218-576-9213

From: Means, Angela (DNR) <Angela.Means@state.mn.us>

Sent: Monday, November 24, 2025 1:14 PM

To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Drew Janke (MP) <djanke@mnpower.com>

Cc: Marrier, Amy (DNR) <amy.marrier@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; Weitzel, Julie (DNR) <Julie.Weitzel@state.mn.us>; Parson, Jessica (DNR) <jessica.parson@state.mn.us>

Subject: [EXTERNAL MAIL] RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

Freeze!

[EXTERNAL EMAIL] This email was sent from someone outside the company.

It may be cold out, but cyber-attacks don't slow down! Remember to freeze, think twice, and never click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Hello Mandy –

I did confirm that we need confirmation for which parcels MN Power has easements for. We would also request a copy of each easement. Once received, we will be able to review the proposed route.

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Sent: Friday, November 21, 2025 12:03 PM

To: Means, Angela (DNR) <Angela.Means@state.mn.us>; Drew Janke (MP) <djanke@mnpower.com>

Cc: Marrier, Amy (DNR) <amy.marrier@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; Weitzel, Julie (DNR) <Julie.Weitzel@state.mn.us>; Parson, Jessica (DNR) <jessica.parson@state.mn.us>

Subject: RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

Hi Angela,

Minnesota Power is completing that concurrently with the DNR's additional review.

Thank you,
Mandy

Mandy Bohnenblust

612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



1 Main Street SE, Suite 300
Minneapolis, MN 55414
612.746.3660 main
www.merjent.com

From: Means, Angela (DNR) <Angela.Means@state.mn.us>
Sent: Friday, November 21, 2025 11:20 AM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Drew Janke (MP) <djanke@mnpower.com>
Cc: Marrier, Amy (DNR) <amy.marrier@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; Weitzel, Julie (DNR) <Julie.Weitzel@state.mn.us>; Parson, Jessica (DNR) <jessica.parson@state.mn.us>
Subject: RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

Good morning –

Have you reviewed for Easement rights associated with these crossings?

From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Thursday, November 20, 2025 9:36 AM
To: Parson, Jessica (DNR) <jessica.parson@state.mn.us>; Drew Janke (MP) <djanke@mnpower.com>
Cc: Means, Angela (DNR) <Angela.Means@state.mn.us>; Marrier, Amy (DNR) <amy.marrier@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; Weitzel, Julie (DNR) <Julie.Weitzel@state.mn.us>
Subject: RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

Good morning,

Thank you again for taking the time to meet with us regarding the proposed ISA Transmission Line Project and possible crossings of LAWCON lands. As discussed, attached is a shapefile of the proposed route, and an updated excel sheet indicating which parcels are in the proposed route and which are not. We would appreciate the DNR's additional review of these parcels to confirm their LAWCON status. In the meantime, Minnesota Power will be reviewing their existing leases within

these parcels.

Please let us know when you're ready for additional discussions and we'll let you know when we've completed the review of the lease agreements.

Thank you again,
Mandy

Mandy Bohnenblust

612.746.3677 direct
612.816.2097mobile
mandy.bohnenblust@merjent.com



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Minneapolis, MN 55414
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From: Parson, Jessica (DNR) <jessica.parson@state.mn.us>
Sent: Tuesday, October 28, 2025 12:09 PM
To: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Drew Janke (MP) <djanke@mnpower.com>
Cc: Means, Angela (DNR) <Angela.Means@state.mn.us>; Marrier, Amy (DNR) <amy.marrier@state.mn.us>; Rokala, Joe A (DNR) <joe.rokala@state.mn.us>; Weitzel, Julie (DNR) <Julie.Weitzel@state.mn.us>
Subject: RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

Good afternoon,

Would any of these work for a conversation with the divisions of Lands and Minerals and Forestry regarding the LAWCON Lands? Looks like these are the soonest times where we are all available. I copied our team on this email.

November 4th 9-10am, or 2:30-3:30pm

November 5th 8:30-9:30am

Thanks,

Jessica Parson

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Minnesota Department of Natural Resources

4805 Rice Lake Rd
Duluth, MN 55803

Phone: 218-328-8826

Email: Jessica.Parson@state.mn.us
mndnr.gov



From: Mandy Bohnenblust <mandy.bohnenblust@merjent.com>
Sent: Tuesday, October 28, 2025 8:32 AM
To: Parson, Jessica (DNR) <jessica.parson@state.mn.us>; Drew Janke (MP) <djanke@mnpower.com>
Cc: Speldrich, Bri (DNR) <Brianna.Speldrich@state.mn.us>; Wilfond, Dan (DNR) <dan.wilfond@state.mn.us>; Bump, Samantha (DNR) <Samantha.Bump@state.mn.us>
Subject: RE: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

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Hi Jessica,

Thank you for following up on our conversation regarding the ISA project and specifically the crossing of West Rocky Run. The Project does need to connect Minnesota Power's St. Louis County Substation with ATC's Arrowhead Substation. The line will enter ATC's Arrowhead Substation directly from the south side of the substation to connect to the new electrical equipment being installed at the south of the substation as part of the Project. The current Proposed Route in this area is relatively wide, allowing for flexibility in selecting the crossing location.

Due to a number of factors, such as maintenance considerations, heat dissipation, and much higher costs, placing 345-kV electrical transmission lines underground is typically impractical and not being considered for the ISA Project.

At this time, we are planning to submit an application to the PUC in December 2025, which will include a Proposed Route and a Preliminary Alignment. The PUC will only approve a route, not

an alignment, so we would be happy to continue the conversation regarding the alignment across West Rocky Run with the DNR and specifically the fisheries staff. Would it make the most sense to have additional conversations after the application has been submitted and reviewed by the DNR? Alternatively, we would be happy to meet at any time to discuss the project and the crossing of West Rocky Run.

Thank you again for the detailed response and information.

Mandy

Mandy Bohnenblust

612.746.3677 direct

612.816.2097mobile

mandy.bohnenblust@merjent.com



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Minneapolis, MN 55414

612.746.3660 main

www.merjent.com

From: Parson, Jessica (DNR) <jessica.parson@state.mn.us>

Sent: Tuesday, October 21, 2025 10:01 AM

To: Drew Janke (MP) <djanke@mnpower.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>

Cc: Speldrich, Bri (DNR) <Brianna.Speldrich@state.mn.us>; Wilfond, Dan (DNR) <dan.wilfond@state.mn.us>; Bump, Samantha (DNR) <samantha.bump@state.mn.us>

Subject: EXTERNAL: Early Coordination for Arrowhead 345 ISA Project: DNR

CAUTION: This email originated from outside of Merjent.

Hi Drew and Mandy,

As mentioned previously in early coordination discussions for the Arrowhead 345 ISA project, there are several very sensitive cold-water (native, naturally reproducing Brook Trout) resources that the project appears to cross. We largely support that all water crossings plan to be spanned crossings, or in some cases bored underground. While the practice of spanning power lines over waterways largely avoids direct in-stream impacts, they are impactful to cold-water resources through changes on the surrounding riparian ecosystem.

The loss of the forest canopy associated with span crossings directly increases water temperatures, which can be lethal to cold-water fish and other aquatic life. The most effective mitigation strategy would be to avoid working in these sensitive areas completely. If this is not feasible, other strategies

such as increasing span length and decreasing the frequency of tower structures while also minimizing existing vegetative removal may be considered as effective mitigation techniques on a case-by-case basis. For special very sensitive resources in the proper scenario, it may be least impactful to cross these waterways via underground or directional boring of utilities rather than spanning. Additional study is suggested to focus on minimizing impacts to high quality Brook Trout stream resources within the utility corridor such as West Rocky Run Creek (S-2-10-3). The proximity of this stream to the substation in Hermantown has led to several stream crossings by transmission lines and impacted this stream's riparian area.

The HVDC modernization project that was recently reviewed near the Hermantown substation generated a lot of discussion and creative problem solving to reduce impacts to the riparian zone along West Rocky Run. We will need to continue thoughtful coordination as trout stream crossings are planned and impacts are minimized.

We appreciate the early and consistent engagement on this project, and hope to continue to coordinate and reduce trout stream impacts. I added our fisheries specialist; Dan Wilfond and our Area Hydrologist in this area Bri Speldrich to this email in addition to our energy project planner Samantha Bump. Feel free to reach out to us as you work through avoidance and minimization. Additionally, please let me know if you would like to schedule a meeting to discuss this further.

Thank you,

Jessica Parson

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Minnesota Department of Natural Resources

4805 Rice Lake Rd
Duluth, MN 55803

Phone: 218-328-8826

Email: Jessica.Parson@state.mn.us
mndnr.gov



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April 28, 2025

Zachary Golkowski
Project Manager – Environmental
ALLETE Inc.
30 West Superior Street
Duluth, MN 55802
zgolkowski@mnpower.com

RE: Written Comments for Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project MPUC Docket Nos. E015/CN-25-111 and E015/TL-25-112

Dear Mr. Golkowski,

This letter is in response to your notification on April 18, 2025, regarding Minnesota Power’s proposal to construct a 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power’s Iron Range Substation in Itasca County to Minnesota Power’s St. Louis County Substation and a one-mile, double-circuit 345 kV transmission line from Minnesota Power’s St. Louis County Substation to ATC’s Arrowhead Substation in St. Louis County. The Minnesota Department of Health (MDH) has reviewed the information that was submitted with the notification for potential impacts on the groundwater and drinking water resources that serve the area and support its public health.

Potential impacts of the proposed project include groundwater contamination in the event of a spill and limiting well owners’ access to properly maintain and seal wells. In order to ensure that access to clean and sufficient water is available, MDH proposing the following methods to mitigate potential impacts from this project:

- Contact information (name, address, phone number) for all well owners with wells located within 200’ of the future line should be identified and cataloged with the well location, for use in the event of a spill or release of hazardous substance. This list of wells should include identification of wells that are not included in the Minnesota Well Index (<https://health.state.mn.us/communities/environment/water/mwi/index.html>) and should also be provided to Nick.Budde@state.mn.us.
- Drill rigs with masts are typically required to service or seal abandoned wells. The presence of active powerlines near a well can make it difficult or impossible to safely

complete this necessary work. The proposed transmission line should be located far enough away from existing wells that safe and legal access for service or sealing with a drill rig is not impacted when the line is active at the maximum proposed voltage. Alternatively, accommodation should be made to well owners to provide an alternative source of water of similar chemistry and supply, as well as sealing of the existing well in accordance with Minnesota Statutes 103I.301 prior to energizing the transmission line to protect the aquifer.

Please refer to the additional well information provided by Nick Budde in an email dated April 21, 2025 and spatial data provided by Kira Silvers dated April 28, 2025. MDH would also like you to consider impacts to nearby surface waters during the construction phase as impaired runoff can negatively impact surface water quality and infiltrate into the groundwater. Properly maintained erosion and sediment control measures are critical to ensuring protected water quality. There are no communities that source their drinking water from a surface waterbody within your proposed project area.

Thank you for your consideration regarding these proposed mitigation methods. If you have any questions, please feel free to contact me at Danielle.Luzinski@state.mn.us or (651) 201-5011. You may also contact the district hydrologist, Nick Budde, at Nick.Budde@state.mn.us or (651) 259-5072.

Sincerely,



Danielle Luzinski, Statewide Surface Water Hydrologist
Minnesota Department of Health
Source Water Protection Unit
PO Box 64975
St. Paul, MN 55164-0975
www.health.state.mn.us

CC: Nick Budde, MDH Source Water Protection Unit
Kira Silvers, MDH Source Water Protection Unit
Chris Parthun, MDH Source Water Protection Unit
John Woodside, MDH Source Water Protection Unit



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Ecological Services
Minnesota-Wisconsin Field Office
3815 American Boulevard East
Bloomington, Minnesota 55425-1665
Phone: (612) 240-6343

June 4, 2025

Mr. Zachary Golkowski
Minnesota Power
30 West Superior St.
Duluth, MN 55802

Dear Mr. Golkowski:

Thank you for the opportunity to review and offer early comments on the Iron Range – St. Louis County – Arrowhead 345 kV Project (ISA Project). Our comments are provided in accordance with the Endangered Species Act (16 U.S.C. 1531-1544) (ESA), Migratory Bird Treaty Act (16 U.S.C. 703-712) (MBTA), and Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d).

- Please consult with our Information for Planning and Consultation (IPaC) system (<https://ipac.ecosphere.fws.gov/>) as you progress through the planning phases for the most up-to-date species list, determination keys, and conservation measures. Species that are either federally protected or proposed for protection may occur in the project area.
- The ISA Project Area occurs within a sensitive area for migratory birds (i.e., close proximity to the Sax Zim Bog and Superior National Forest Important Bird Areas, as well as the migration corridor features along the Laurentian Divide and Lake Superior). We recommend consulting with the Cornell Lab of Ornithology's eBird database (<https://ebird.org/home>) and Birdcast website (<https://birdcast.info>) for more robust and real-time data on bird occurrence and timing/composition/estimated altitude of bird migration throughout the ISA Project Area. While incidental take is not prohibited under the MBTA, we believe that siting and design concessions could avoid or minimize impacts of the project to migratory birds. We have attached a list of best management practices to this letter.

- If the ISA Project may impact Bald or Golden Eagles, we would encourage you to obtain an eagle take permit. Eagle take permits are voluntary, and ATC/Minnesota Power must assess its own risk of impacts to eagles.
 - The most up-to-date information on the permitting process (including eligibility requirements for general and specific permits) can be found on the Eagle Incidental Take Permits for Powerlines page (<https://www.fws.gov/program/eagle-management/power-line-permits>).
 - Additional information on permit application procedures can be found on the FWS ePermits site for Specific (https://fwsepermits.servicenowservices.com/fws?id=fws_kb_view&sys_id=0ab430cedbb042900a66e46b139619e6) and General (https://fwsepermits.servicenowservices.com/fws?id=fws_kb_view&sys_id=63943c8edbb042900a66e46b13961966) eagle incidental take permits from powerline activities.

- We recommend siting the ISA Project such that it minimizes habitat fragmentation by adhering to existing developed Rights-of-Way (ROW) to the greatest extent possible.

- We recommend preservation and enhancement of native plant communities, especially for re-vegetation of areas disturbed within new and existing ROW, to ensure on-going protection of native plant communities and pollinator species.
 - For temporary and permanent habitat restoration/abatement, use only native and local (when possible) seed and plant stock. Pollinator-favored plants can be found on this list: <https://www.fws.gov/media/plants-favored-rusty-patched-bumble-bee>
 - Consider creating vehicle wash stations prior to entering sensitive habitat areas to prevent accidental introduction of non-native plants.
 - Because pollinators are dependent on flowering plants for nutrients and energy, especially in the summer, we recommend mowing at a rate or height that does not reduce a significant number of flowering plants for foraging pollinators (for additional recommendations, please review this document: <https://www.fws.gov/media/conservation-management-technical-assistance-rusty-patched-bumble-bee>).
 - If possible, we recommend that any mowing or ground disturbance during construction or maintenance not take place until after the native plant communities have stopped flowering.

Please do not hesitate to contact Katie O'Brien at katie_obrien@fws.gov with the Minnesota-Wisconsin Ecological Services Field Office should you have any questions or concerns. We appreciate your early coordination efforts. We believe, through continued discussion, that we can help develop wildlife focused measures to protect federal trust resources while meeting the Project's energy production objectives. We look forward to this continued collaboration.

Sincerely,

ROBERT
TAWES

Digitally signed by
ROBERT TAWES
Date: 2025.06.04
12:33:03 -05'00'

Robert Tawes
Field Supervisor

cc: Samantha Bump, Martin Donovan, Bridget Henning-Randa, Jessica Parsons (MN DNR)
Rich Davis (MN DOC)
Andrew Horton (USFWS)

Attachment A: Optional Best Management Practices to Avoid or Minimize Impacts to Migratory Birds

- If the ISA Project will include tree-clearing activities, we request that you evaluate and disclose impacts to all forest-dwelling species of federal interest and include associated conservation measures to minimize risk, impacts, and adverse effects.
 - We recommend limiting forest clearing activities to occur outside of the migratory bird nesting season (March 1 – August 31) and summer occupancy period for Northern Long-eared Bat (April 15 – September 30). If clearing must be completed within the bat occupancy season, we recommend surveys be conducted to avoid or minimize take of federally protected species.

- We recommend development of an Avian Protection Plan to reduce avian risk of electrocution, collision, and death, as well as bird-caused power outages. We recommend inclusion of the following guidelines from the Avian Power Line Interaction Committee:
 - To ensure adequate clearance, design structures should, at a minimum, provide at least 60 inches of horizontal separation between energized conductors and/or energized conductors and grounded hardware and 48-60 inches of vertical separation.
 - Avoid siting lines in areas where birds concentrate (i.e., wetlands, stream crossings, historic staging areas, roosts, and nesting colonies).
 - Install visibility enhancement devices (e.g., marker spheres, spirals, suspended devices, bird diverters) placed in varying configurations, depending on the line design and location; large diameter wire may also increase line visibility.
 - If a “problem pole” is identified (i.e., documented avian collision, electrocution, problem nest material, or high risk of avian mortality), we recommend retrofitting the pole by 1) covering jumper wires, conductors, and equipment; 2) discouraging perching in unsafe areas (e.g., perch guards); 3) reframing; 4) replacing a structure; or 5) providing safe alternatives for perching and nesting (e.g., nesting platforms).
 - When collisions cannot be reduced by another method such as line marking or managing surrounding lands, the configuration of an existing line can sometimes be changed to minimize collisions. Options for changes might include: 1) lowering the height of the lines (e.g., below the tree line); 2) changing the wire diameter; 3) bundling wires; 4) using spacers to improve visibility; 5) rearranging wire configuration (e.g., converting from vertical to horizontal); 6) changing the structure type to increase its visibility; or 7) decreasing span length (e.g., by adding a pole mid-span).
 - Consider construction, placement, and monitoring of nest boxes for cavity-nesting species (e.g., bluebirds, swallows, chickadees, wrens) to enhance avian populations, as well as bats and flying squirrels.

- We recommend limiting any increase in lighting of native habitats during the avian breeding season through the following actions:
 - To the maximum extent practicable, limit construction activities to the time between dawn and dusk to avoid illumination of adjacent habitat areas.
 - If construction activity time restrictions are not possible, use down shielding or directional lighting to avoid light trespass into wildlife habitat. To the maximum extent possible, while allowing for public safety, low intensity lighting should be used.
 - Eliminate the use of steady burning lights on tall structures (e.g., greater than 200 feet in height).

June 6, 2025

Zachary Golkowski
Project Manager- Environmental
Strategic Initiatives
Allete Inc.
zgolkowski@mnpower.com

RE: Iron Range – Arrowhead 345 kV Transmission Project
St. Louis County
SHPO Number: 2025-1052

Dear Zachary Golkowski:

Thank you for the opportunity to comment on the above referenced project. We understand that this project will require a Minnesota Public Utilities Commission route permit. Therefore, the submitted information has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (138.665-666). If this project will be located on non-federal public land, the project will also be subject to review under the Minnesota Field Archaeology Act (138.40).

As we understand it, the project includes the construction of a new, approximately 62-mile-long, single-circuit 345 kV transmission line on double-circuit capable structures from Minnesota Power's Iron Range Substation in Itasca County, Minnesota to Minnesota Power's St. Louis County Substation. The Project also involves construction of a new, approximately one-mile, double-circuit 345 kV transmission line from Minnesota Power's St. Louis County Substation to ATC's Arrowhead Substation in St. Louis County, Minnesota.

Due to the nature and location of the proposed project, we recommend that a Phase I archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking such surveys, please visit the website preservationdirectory.mnhs.org, and select "Archaeologists" in the "Specialties" box.

Because there is no federal nexus for this project, a Phase I reconnaissance level architectural history survey is not required. However, the project should take into account the introduction of visual, atmospheric, or audible elements that may have an effect on any above ground designated historic properties. Designated historic properties are those properties that are listed in the National or State Register of Historic Places, or properties that are included in the State Historic Sites Network.

The resulting cultural resources report should include a map with clearly marked project areas in relation to any identified cultural resources (architectural properties and archaeological sites). The

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

mn.gov/admin/shpo ■ mnshpo@state.mn.us

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

ISA Combined Application
Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 231 of 248

report should discuss ways in which the Project will avoid impacting, both directly and indirectly, any cultural resources that are identified.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency in order to define an appropriate area of potential effects for the federal undertaking as well as the necessary historic property identification and evaluation efforts required for a federal review. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact me at 651-201-3285 or kelly.graggjohnson@state.mn.us.

Sincerely,

Kelly Gragg-Johnson

Kelly Gragg-Johnson
Environmental Review Specialist

Division of Ecological and Water Resources
Region 2 Headquarters
1201 Highway 2
Grand Rapids, MN 55744

June 25, 2025

Zach Golkowski
Senior Environmental Compliance Specialist
Minnesota Power/ALLETE, Inc.
30 W. Superior St.
Duluth, MN 55802

Dear Mr. Golkowski,

Thank you for engaging the Minnesota Department of Natural Resources (DNR) in early coordination during the development of the Arrowhead 345 kV High Voltage Transmission Line (HVTL). This HVTL project proposes to connect the forthcoming expansion of the Iron Range Substation east of Grand Rapids (part of the Northland Reliability Project) to the Arrowhead Substation near Hermantown totaling approximately 64 miles through Itasca and St. Louis Counties. It is our understanding that the company intends to parallel at least 80% existing transmission Right-of-Way (ROW).

We appreciate you providing the project notification that we received April 18th, 2025. According to the notice, the intended timeline for submittal of the Certificate of Need and Route Permit to the Public Utilities Commission was initially February 2026; we have since learned it is likely be submitted earlier, potentially December 2025.

DNR requested additional project information, including shapefiles of the study area and the existing lines within and received those May 2nd, 2025. DNR staff attended public open houses across the project corridor May 20th and 22nd, 2025. DNR also requested a kickoff meeting with the company and its consultants to introduce DNR specialists to the project, which occurred June 10th, 2025 in Grand Rapids.

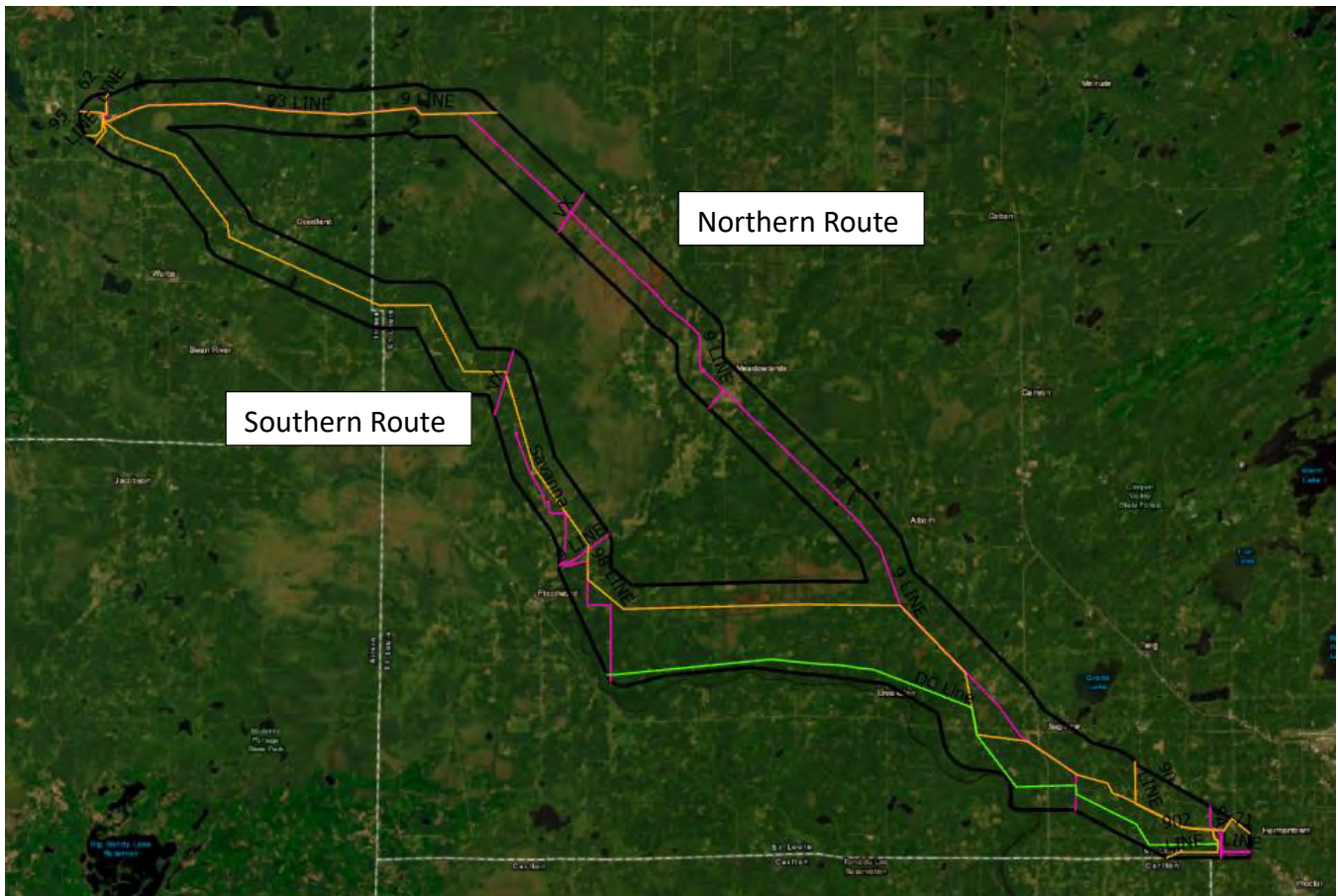
General Comments:

1. Comments included here are general, and we will have additional and site-specific comments when a preferred route is identified.
2. The project intends to parallel existing transmission ROW, which is preferred by DNR in most cases. Installing newly disturbed and maintained corridors, rather than following existing infrastructure fragments the landscape and habitat, and result in an additional corridor susceptible to future development and subsequent habitat loss and degradation. Habitat

fragmentation is one of the largest threats to wildlife as increasing development puts pressure on what few natural areas remain intact. There are occasionally instances where deviating from existing lines is preferred to avoid natural resources, rare features, or recreational facilities.

3. The DNR encourages the proposer to prioritize avoiding natural areas that would require vegetation and tree removal or ground disturbance in shoreland, wetlands, Minnesota Biological Survey (MBS) Sites of Biodiversity Significance, and undisturbed native plant communities (NPCs). Habitat preservation should also be prioritized on and near public lands, riparian areas, wildlife management areas (WMAs), state parks, and county parks. Infrastructure should be consolidated in sensitive areas, and additional ROW should be minimized.
4. Necessary temporary or permanent access roads and construction staging areas are important to evaluate for rare features and overall impacts in addition to the proposed ROW. Once a preferred route has been identified, and potential access considerations are being evaluated, further coordination with DNR may be needed to review these sites for additional impacts to rare features and public waters.
5. Occurrences of rare features and state-listed species may help inform route selection. We recommend submitting the project into [Minnesota Conservation Explorer](#) (MCE), when a more defined preferred route is selected. Minnesota's Endangered Species Statute (*Minnesota Statutes*, section 84.0895) and associated Rules (*Minnesota Rules*, part 6212.1800 to 6212.2300 and 6134) prohibit the take of threatened or endangered species without a permit. Northern Long-eared Bat (NLEB) habitat exists across much of the proposed project corridor, this species is federally listed as endangered and will require coordination with the United States Fish and Wildlife Service (USFWS) on avoidance and permitting.
6. There are a significant number of public water crossings that will need utility licenses, including some trout streams. DNR encourages reducing additional ROW to the extent possible at crossings. Note that if the route crosses a Public Water Wetland, a DNR Public Waters Work Permit is required and can be applied for through the [Minnesota DNR Permitting and Reporting System](#) (MPARS).
7. General preferences for this type of project; any additional land clearing should be landward with maintaining existing buffers along the streams. If no other options for access, temporary construction stream crossings should span the watercourse and follow the [no permit needed bridge criteria](#) to reduce public water impacts and potential impacts to hydraulics if flooding event occurs. Any revegetation should follow native plant mix free of invasives. If any crossings will result in bank destabilization; those crossings should be completed outside of the fisheries work exclusion window to prevent suspended sediments impacting fish spawning. Otherwise, DNR prefers for wetland and public water work be done during low water conditions.
8. A DNR Water Appropriation Permit is required if the water pumped exceeds 10,000 gallons in a day, and/or one million gallons in one year. The DNR General Permit for Temporary Appropriation, with its lower permit application fee and reduced time for review, may be used for the dewatering if the dewatering volume is less than 50 million gallons and the time of the appropriation is less than one year. A DNR Water Appropriations Permit can also be applied for using MPARS.

9. Mineral Potential across Study Area. In areas where there is high to moderate aggregate potential and mapped potential peat resources, DNR must ensure that these resources are not encumbered by the construction of the transmission line. Further discussions and agreements will be needed if these resources are likely to be crossed permanently encumbering the resource(s).
10. The route should not cross the existing peat lease along the southern route. If these resources are crossed, forthcoming utility licensing may include language that allows the State to cancel the license, and it would be the physical and financial responsibility of the company to move the line.
 - Metallic Minerals: DNR has no concerns with the existing route or the study area from a metallic mineral resources perspective.
 - Aggregate: Please see the attached shapefile of state parcels with aggregate potential (high, moderate, low, and insignificant) – only the existing routes were analyzed, and not the broader study area.
 - Peat: Please see the attached PDF, that shows mapped peat from the peat inventory including historical and active peat leases. Links to these GIS layers can be found within the PDF.
11. The DNR Lands and Minerals Division is responsible for granting permission to companies that propose to cross state lands and public waters with utility infrastructure projects. This permission is in the form of a utility crossing license. Applicants apply for a license by submitting an application. When potential/preferred routes are selected, DNR requests that a lands package be provided to the DNR Division of Lands and Minerals as soon as possible.
 - The utility license to cross state lands review will help identify if there are natural resource and recreation concerns in specific areas. This can be helpful to know early, in the case adjustments need to be made to the route.
 - The utility license to cross state lands review will also determine if there are deed, contract, funding, or other restrictions on state lands. Deed, contract, and funding restrictions could impact licensing and routing of the transmission line.
 - Some lands owned by the State of Minnesota were purchased using funds that put restrictions on the lands. Before the DNR can grant a utility license over state lands with funding restrictions, DNR must receive written approval from the funding provider. The DNR will identify if and where there are funding restrictions on state lands. The funding provider review can take up to a year or more. Approval may or may not be granted by the funding provider.

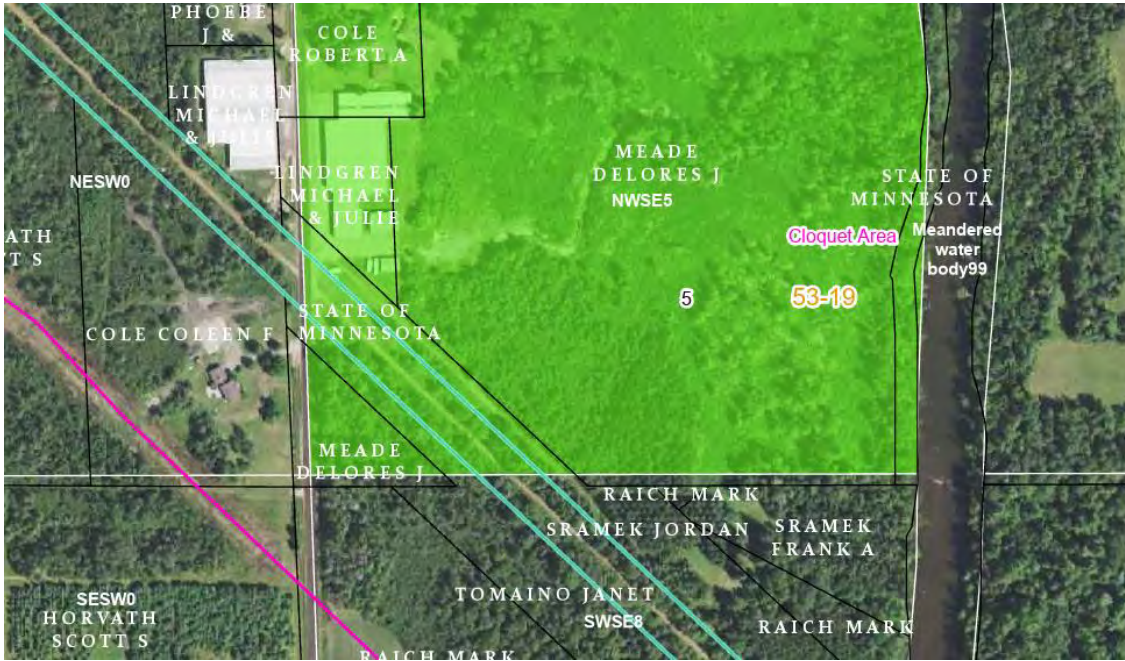


Specific Comments: Northern Route

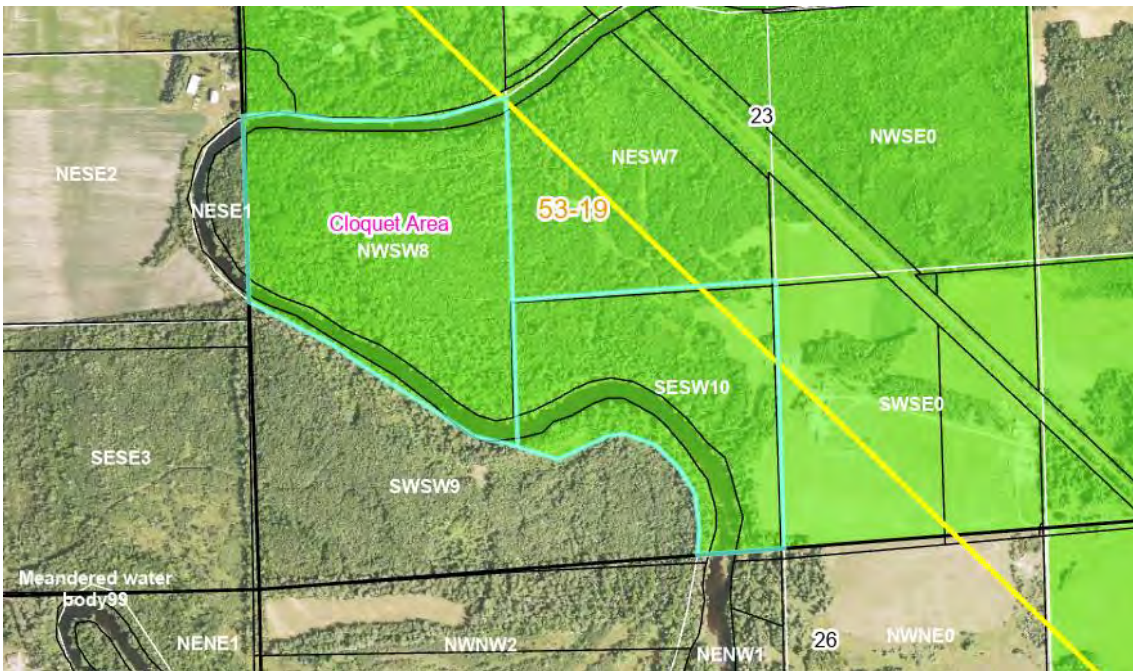
The existing ROWs along the Northern Route intersect with many more state land parcels than the southern route. The cover types of these parcels are largely comprised of forested wetlands and peatlands, including a mix of lowland spruce, tamarack, and northern white cedar bog; with red pine, white spruce, aspen, birch, balsam, and jack pine found in the upland. The northern route crosses a 17 mile stretch of the Sax-Zim Bog Important Bird Area (IBA). The Sax Zim Bog has records of over 240 different bird species and is nationally known as a destination to see northern owls such as the Great Gray Owl, Boreal Owl and Northern Hawk Owl, especially in the fall and winter months. A remnant population of Black-billed Magpies can be seen year-round and may be one of the most eastern populations in the United States. Due to the sensitive nature of this habitat, and the diverse array of species it supports, the DNR prefers the project follow the southern route along existing ROW corridors.

The following acquired lands along the northern route appear to have LAWCON funding and should be avoided:

- 1.) Lot 5; Sec 5-53-19 – on the northern route. State only owns a corridor running through Lot 5.



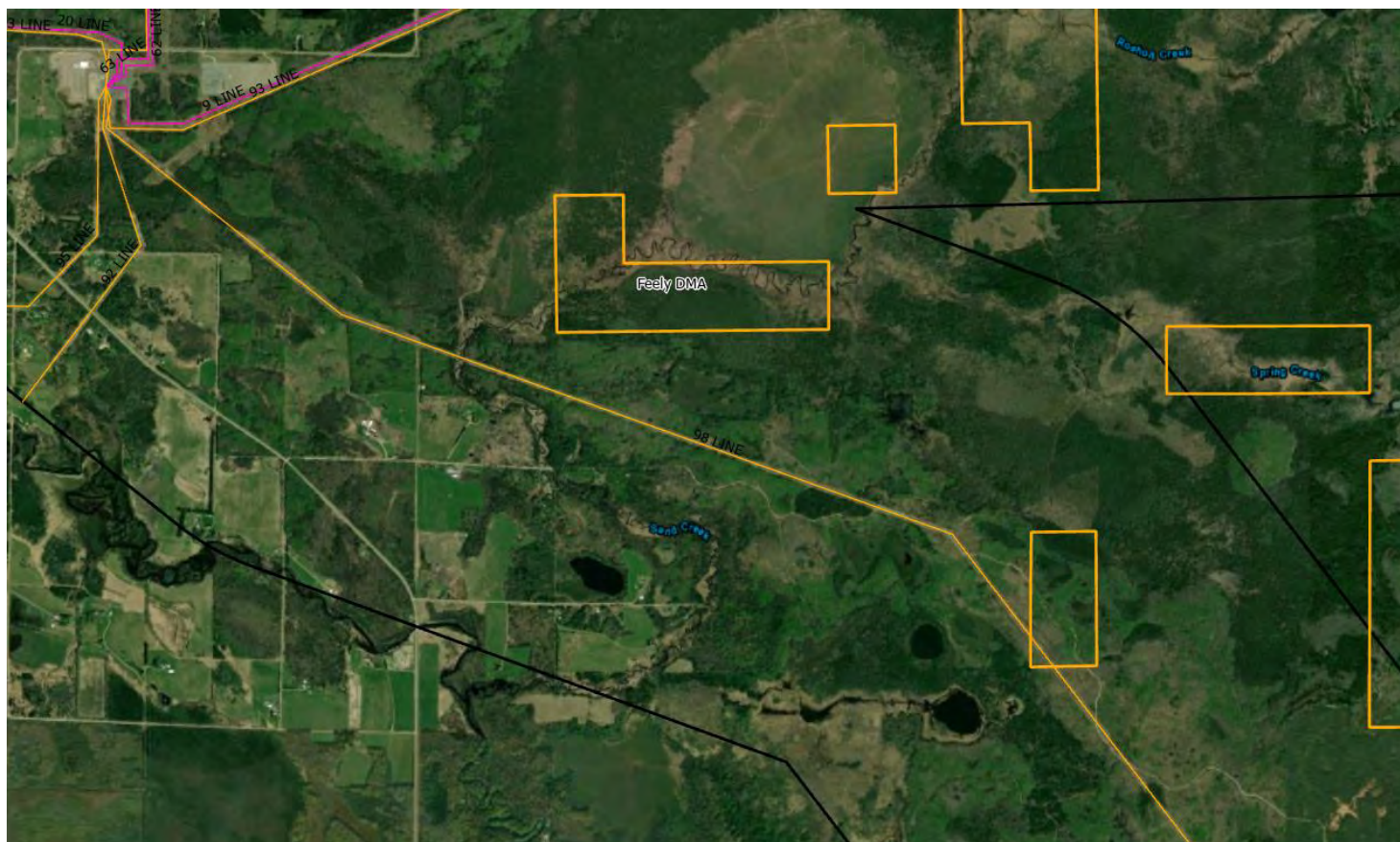
- 2.) Lots 8 and 10; Sec 23-53-19



Specific Comments: Southern Route

The southern route is the preferred route from the DNR perspective; as there are less state land crossings, and only crosses a half mile of the Sax Zim Bog IBA; even though this route is not within the IBA, a 12 mile stretch of existing ROW is adjacent to the southern boundary of the IBA. This area may need additional considerations for bird avoidance/collision prevention (such as flight diverters over open bog areas/peatlands). While both the Northern and Southern Routes cross numerous wetlands, the Southern Route does not traverse wetland complexes that are as large and contiguous as those along the Northern Route.

The Feeley Deer Management Area (DMA) Management Opportunity Area (MOA) is largely located within the proposed project study area. This DMA is one of our remaining historical deer wintering areas that is actively managed for this purpose. The existing ROW intersects the corner of one of the parcels within the DMA MOA (see orange polygons in map below). This winter habitat area encompasses approximately 1418 acres, all state-administered school trust lands, administered by the Division of Forestry. There are candidate old growth forest stands that need avoidance and special consideration for vegetation management adjacent to these stands if this route is selected. DNR encourages that the new transmission line follows the existing corridor and not expand into the DMA if this route is selected.



There is an active peat lease just north of the southern branch of the existing line (See map below; green polygon). This active peat lease should be avoided.

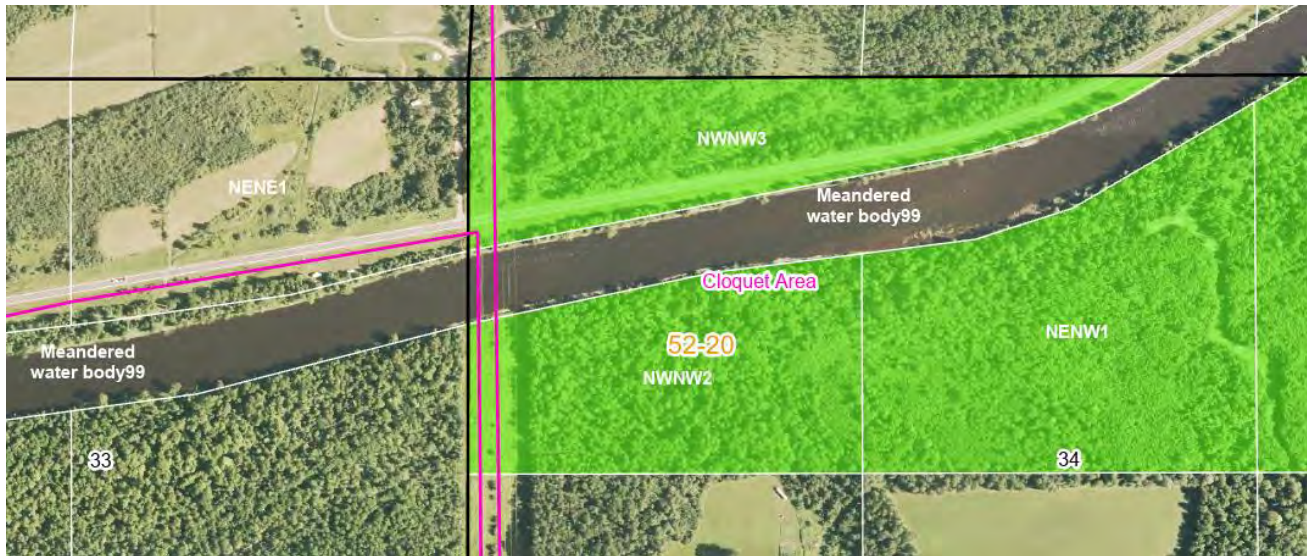


The existing HVTL (DC line) intersects with the St. Louis River Ruffed Grouse Management Area (RGMA). DNR encourages that the new transmission line follows the existing corridor and not expand into the RGMA if this route is selected. Selection of the 9 Line corridor would avoid this RGMA.



Along the Southern Route, the following acquired lands appear to have LAWCON funding and should be avoided:

- 1.) Lots 1, 2 and 3; Sec 34-52-20



Rare Features & Ecological Information

The proposed project has the potential to impact several known occurrences of state-protected species, and will require further coordination with DNR's Natural Heritage team. Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134) prohibit the take of endangered or threatened plants or animals, including their parts or seeds, without a permit. To ensure compliance with Minnesota's Endangered Species Statute and Rules, submit a [Natural Heritage Review](#) request through the [Minnesota Conservation Explorer \(state.mn.us\)](#). It is recommended that Conservation Planning Reports and Natural Heritage Reviews be conducted early in the project planning process, this helps identify if, where, and when rare species surveys are needed.

To ensure compliance with federal endangered species law, we recommend the proposer conduct a federal regulatory review using the U.S. Fish and Wildlife Service's (USFWS) online [Information for Planning and Consultation \(IPaC\) tool](#).

Specific Recommendations:

- DNR recommends avoiding routing through MBS sites of Outstanding or High Biodiversity Significance, DNR Native Plant Communities with a conservation status rank which includes S1,

S2, or S3, and old growth forests. Additionally, we recommend working in previously disturbed areas as much as possible, such as routing along existing transmission of road rights-of-way. When the project must go through these sites, utilize existing ROW as much as possible, and limit ROW expansion by as little as possible.

When the route is identified, be sure to consider avoidance measures for rare mussels near river crossings, bald eagle nests, and rare bat species where tree removal will occur.

Rare animal species have been documented near the existing ROW in T51 R20 Sec 23 and 24. DNR Recommends consolidation at this location if possible, or if any necessary expansion of the ROW occurs, that it be to the north of the existing ROW rather than to the south to avoid the species and their sensitive forested wetland habitat.

The line is directly adjacent to a Natural Origin Red Pine (NORP) stand in T51 R17 Sec 20. Avoid expanding the ROW into the rare NORP. There are also stands of yellow birch and white cedar that DNR recommends avoiding where possible.

Next Steps

The DNR appreciates continued coordination with the proposer prior to the joint application submittal to the PUC with the goal to identify solutions to concerns raised in this letter. We look forward to learning more about routing preferences and working to provide you with feedback to help identify the best route possible.

Thank you again for your ongoing coordination. Please let us know if you have any questions.

Sincerely,



Jessica
Parson

Digitally signed by
Jessica Parson
Date: 2025.06.25
12:42:45 -05'00'

Jessica Parson
Regional Environmental Assessment Ecologist
Minnesota Department of Natural Resources

CC: Zach Golkowski, Minnesota Power
Mandy Bohnenblust, Merjent Inc

Samantha Bump, DNR Energy Projects Planner

Joe Rokala, DNR LAM State Program Administrative Director

Clarissa Spicer, DNR Northeast Regional Director

Darrell Schindler, DNR R2 Regional Manager

Greg Root, DNR R2 Assistant Regional Manager

October 6, 2025

Kevin Mieras
Merjent, Inc.
kevin.mieras@merjent.com

RE: Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
Itasca and Saint Louis Counties
SHPO Number: 2025-1708

Dear Kevin Mieras:

Thank you for providing information about the proposed project referenced above. We understand that Minnesota Power and American Transmission Company, LLC are proposing a transmission line and substation expansions that will be permitted through the Minnesota Public Utilities Commission.

Due to the nature and location of the proposed project, we recommend that an archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking such surveys, please visit the website www.mnhs.org/preservation/directory, and select "Archaeologists" in the "Specialties" box. We will reconsider the need for survey if the project area can be documented as previously surveyed or disturbed. Any previous survey work must meet contemporary standards. **Note:** plowed areas and existing right-of-way are not automatically considered disturbed. Archaeological sites can remain intact beneath the plow zone and in undisturbed portions of the right-of-way.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

Please submit additional information via email to ENReviewSHPO@state.mn.us and reference SHPO # 2025-1708 in the subject line of your email and in your cover letter. Please submit the requested archaeological survey using the Office of the State Archaeologist's Portal as described on our website. If you have any questions regarding our review of this project, please contact Lucy Harrington, Environmental Review Archaeologist, at lucy.harrington@state.mn.us.

Sincerely,



Amy Spong
Deputy State Historic Preservation Officer

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

mn.gov/admin/shpo ■ mnshpo@state.mn.us

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

ISA Combined Application
Docket Nos. E015/CN-25-111 and E015/TL-25-112

Appendix P

Page 243 of 248



AN ALLETE COMPANY

Date: July 22, 2025

To: Jim Gottschald, Deputy County Administrator, and St. Louis County Commissioners
Via email: gottschaldj@stlouiscountymn.gov

From: Zach Golkowski, Project Manager, Minnesota Power

Re: ISA Transmission Project Update – Preliminary Route

Minnesota Power attended the May 6, 2025 St. Louis County Board Meeting to present the proposed ISA Transmission Project (Project) to the county commissioners. The purpose of this memo is to provide an update on the Project status and to continue engagement with the county. Minnesota Power welcomes any feedback the county may have on the Project.

The proposed Project is an approximately 63-mile-long 345-kilovolt transmission line between Minnesota Power’s Iron Range Substation near Grand Rapids in Itasca County, connecting to Minnesota Power’s St. Louis County Substation, and American Transmission Company’s Arrowhead Substation near Hermantown, Minnesota. The Project, as part of MISO’s Tranche 2.1 portfolio, is needed to enhance the reliability of the grid in the Upper Midwest, increase grid efficiency to get power from where it is created to where it is needed, and meet the growing demand for new reliable clean energy.

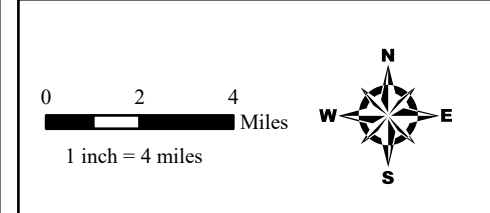
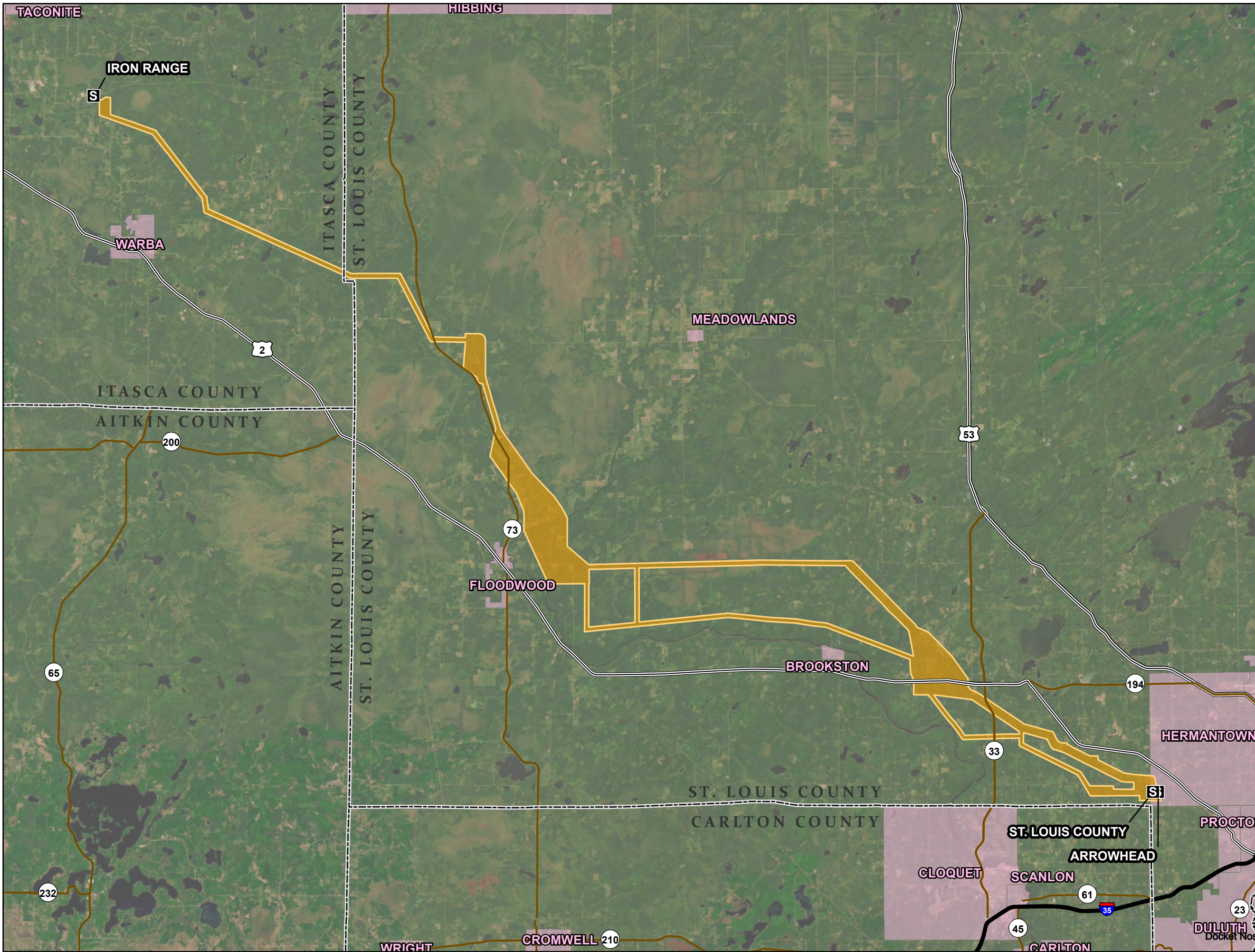
Minnesota Power developed an initial study area that provided potential routing options which met Minnesota Public Utilities Commission’s (MnPUC) routing criteria to locate new transmission lines parallel to existing high-voltage transmission line infrastructure. Since our last presentation to the county, Minnesota Power hosted public open houses in May 2025 and coordinated with landowners, Tribal governments and local, state, and federal agencies, including the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and Minnesota Department of Natural Resources. Agency and stakeholder comments included feedback on routing and impacts to aesthetics, wildlife, landowner property interests, and environmental resources. Based on that input, Minnesota Power refined the initial study area and identified a Preliminary Route (see attached map).

Minnesota Power is hosting a second round of open houses to seek input on the Preliminary Route, which will further be refined into a Proposed Route and Proposed Alignment that will be used for the permitting process with the MnPUC. The open house schedule is as follows:

Wednesday, August 6	Thursday, August 7
<p>12:00 – 2:00 PM Coleraine City Hall Nyberg Community Center 302 Roosevelt Ave Coleraine, MN 55722</p>	<p>1:00-3:00 PM Hermantown Government Center/ City Hall – Training Center 5105 Maple Grove Road Hermantown, MN 55811</p>
<p>5:00-7:00 PM Floodwood Event Center 201 W 7th Avenue Floodwood, MN 55736</p>	<p>5:00-7:00 PM Solway Town Hall 4029 Munger Shaw Road Cloquet, MN 55720</p>

The Project schedule remains unchanged. Minnesota Power and American Transmission Company intend to submit a joint Certificate of Need and Route Permit application to the MnPUC by February 6, 2026.

If you have any questions, comments, or would like to request a meeting, please contact me at (218) 355-3366 or z Golkowski@mnpower.com.



- S** Substation
- Preliminary Route
- City Boundary
- County Boundary

ISA Project
Minnesota Power
 Project Overview

merjent.

ISA Combined Application
 Docket Nos. E015/CN-25-111 and E015/TL-25-112
 For Environmental Review Purposes Only

Date: (7/9/2025) Source: Z:\Clients\MW_P\MN_Power\ISA_Project\ArcGIS\Permitting\State\001_ArcPro\USA_Project.aprx



AN ALLETE COMPANY

Date: October 7, 2025

To: Jim Gottschald, Deputy County Administrator, and St. Louis County Commissioners
Via email: gottschaldj@stlouiscountymn.gov

From: Drew Janke, Project Manager, Minnesota Power

Re: ISA Transmission Project Update

Minnesota Power attended the May 6, 2025 St. Louis County Board Meeting to present the proposed ISA Transmission Project (Project) to the county commissioners. Minnesota Power also provided a Project update memo on July 22, 2025 regarding the refinement of the initial study area to the Preliminary Route. The purpose of this memo is to provide an update on the Project status and to continue engagement with the county. Minnesota Power welcomes any feedback the county may have on the Project.

The proposed Project is an approximately 67.5-mile-long 345 kilovolt transmission line between Minnesota Power's Iron Range Substation near Grand Rapids in Itasca County, connecting to Minnesota Power's St. Louis County Substation, and American Transmission Company's Arrowhead Substation near Hermantown, Minnesota. The Project, as part of MISO's Tranche 2.1 portfolio, is needed to enhance the reliability of the grid in the Upper Midwest, increase grid efficiency to get power from where it is created to where it is needed, and meet the growing demand for new reliable clean energy.

Minnesota Power developed an initial study area that provided potential routing options which met Minnesota Public Utilities Commission's (MnPUC) routing criteria to locate new transmission lines parallel to existing high-voltage transmission line infrastructure. Minnesota Power hosted public open houses in May 2025 and identified a Preliminary Route based on agency and stakeholder input. Minnesota Power hosted a second round of public open houses in August 2025 to seek input on the Preliminary Route, which helped refine it further into a Proposed Route and Proposed Alignment. Minnesota Power has coordinated with landowners, Tribal governments, and local, state, and federal agencies throughout the routing process.

Minnesota Power and American Transmission Company (the Applicants) are in the process of drafting the joint Certificate of Need and Route Permit application, which is planned for submittal to the MnPUC by December 1, 2025. The Applicants are also drafting an Environmental Assessment to be attached to the application. On September 19, 2025, the Applicants sent a Notice of Availability for Pre-Application Coordination to Minnesota Tribal governments, state technical resource agencies, and local government units within the Notice Area (see attached).

If you have any questions, comments, or would like to request a meeting, please contact me at 218-355-3569 or djanke@mpower.com.

