minnesota power
AN ALLETE COMPANY

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VIA ELECTRONIC FILING

January 16, 2015

Daniel P. Wolf Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: Minnesota Power's Application for a Route Permit – Alternative Permitting Process
16 Line Reroute Transmission Project
Docket No. E015/TL-14-977

Dear Mr. Wolf:

Please find the Minnesota Power ("Applicant") Route Permit Application ("Application") for a three mile 115 kV high voltage transmission line located South of the Fayal Township, MN ("16 Line Reroute Project"). The Application details the Applicant's proposed location of the 16 Line Reroute Project, located in St. Louis County.

The Route Permit Application is submitted under the Alternative Permitting process of Minn. Rules 7850.2800 to 7850.3900 and Minn. Stat. § 216E.04. An electronic copy on CD ROM and 25 paper copies of the Application have been provided to Bill Storm of the Department of Commerce, Energy Environmental Review and Analysis.

Minnesota Power awaits an invoice from Department of Commerce for processing the route permit application (as required by Minn. Rules 7850.1800 and Minn. Stat. § 216E.18).

Please direct any questions you may have with respect to the filing to Daniel McCourtney of Minnesota Power at 218-355-3515.

Thank you for your attention to this project.

Yours truly,

David R. Moeller

MINNESOTA POWER

APPLICATION TO THE MINNESOTA PUBLIC UTILITIES COMMISSION FOR A ROUTE PERMIT

16 LINE RE-ROUTE

115 KV TRANSMISSION LINE

Alternative Permitting Process
PUC Docket No. E015/TL-14-977

January 16, 2015

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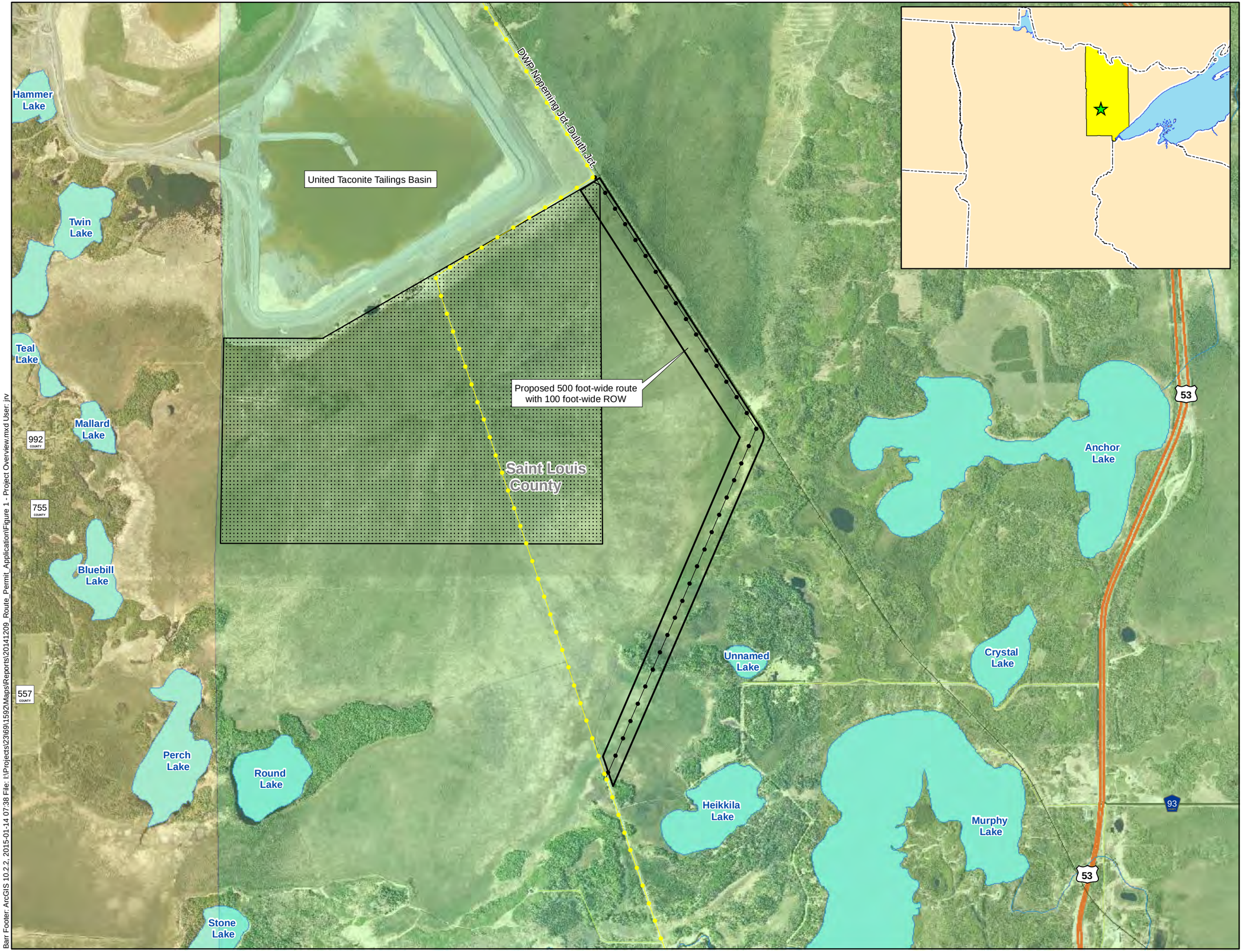
1.0 Executive Summary

1.1 Proposal Summary

Minnesota Power, a division of ALLETE, Inc., (Minnesota Power or the Applicant) submits this application (Application) for a Route Permit to the Minnesota Public Utilities Commission (Commission) pursuant to Minnesota Statutes (Minn. Stat.) Chapter 216E and Minnesota Rules (Minn. R.), chapter 7850. A Route Permit is requested for an approximately three-mile-long, 115 kilovolt (kV) high voltage transmission line (HVTL) reroute. In addition, three miles of existing transmission line will be taken out of service and removed. The proposed transmission line construction and removal is collectively referred to as the Project.

The proposed Project is located south of Fayal Township and approximately four miles east of McDavitt Township in St. Louis County, Minnesota. The proposed HVTL would connect to Minnesota Power's existing 16 Line on the east side of United Taconite's existing tailings basin and proceed southeast, parallel to an existing railroad grade for approximately 1.25 miles. The line would then proceed southwest for approximately 1.75 miles where it would connect to the existing 16 Line.

United Taconite is planning to extend its existing tailings basin area on their property in 2016. Minnesota Power's existing 16 Line is currently located directly within the footprint of the proposed expansion. To accommodate the planned tailings basin, it is necessary to re-route a three-mile portion of the 115 kV line. The existing line is located on property leased from United Taconite which is requiring Minnesota Power to reroute the HVTL by 2016.. Minnesota Power's proposed Project will be located on land owned by United Taconite, the State of Minnesota, St. Louis County and one private landowner. An overview of the proposed Project elements is in Figure 1 and a detailed map is in Figure 2. Construction of the tailings basin addition will begin in 2016; therefore, a timely approval is required.



Existing 16 Line
Proposed 16 Line Alignment
Proposed 16 Line 500 foot-wide Route
PWI Basin
PWI Watercourse
Tailings Basin Expansion Area

Township Boundary

Heikkila Lake Township
McDavitt Township

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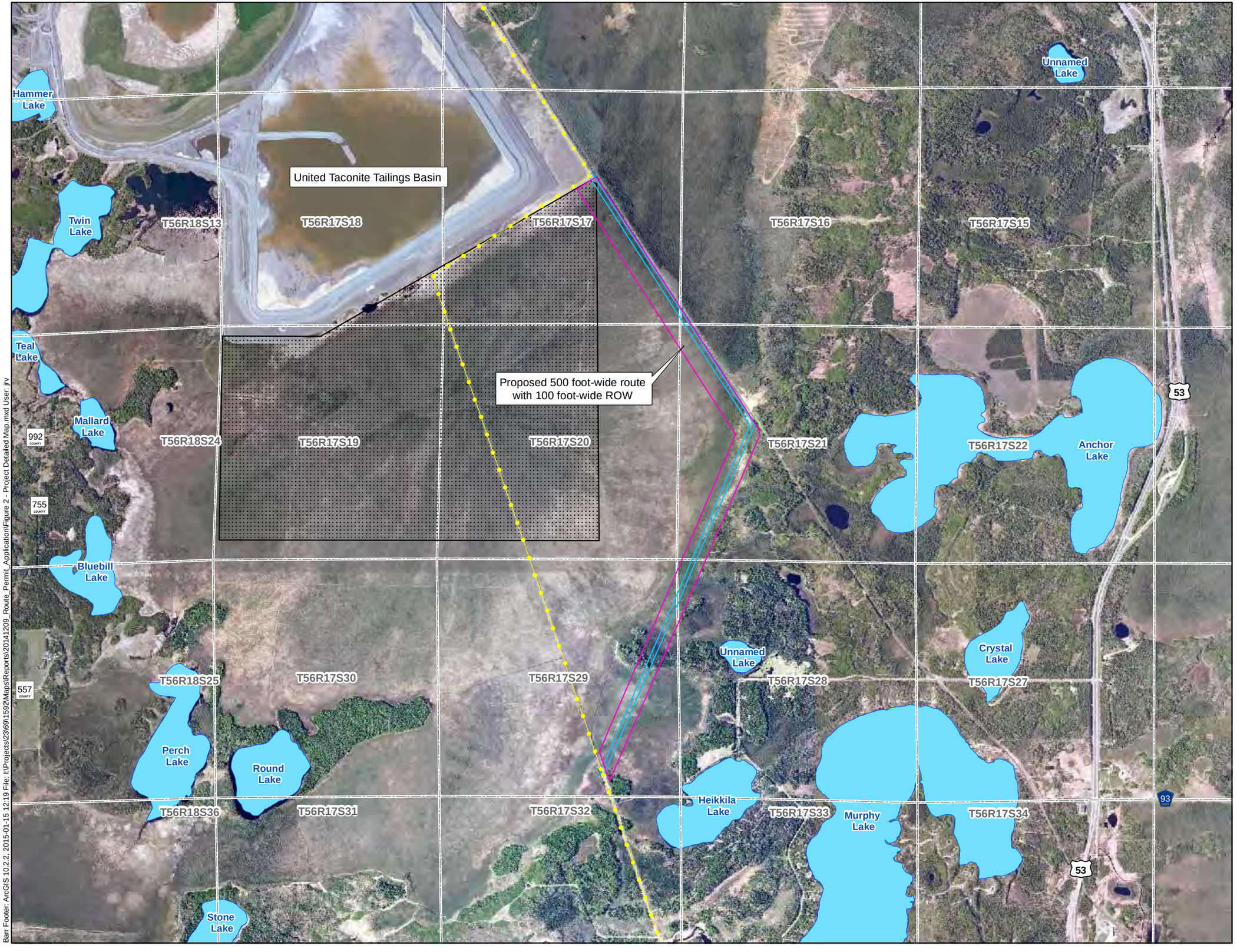
N

0 2,000 4,000 Feet

Figure 1

PROJECT OVERVIEW
Proposed 16 Line Reroute
Saint Louis County, MN

Barr Footer: ArcGIS 10.2.2, 2015-01-14 07:38 File: I:\Projects\23\691\592\Maps\Reports\20141209_Route_Permit_Application\Figure 1 - Project Overview.mxd User: jrv



Existing 16 Line
Proposed 16 Line 100 foot-wide ROW
Proposed 16 Line 500 foot-wide Route
PWI Basin
Tailings Basin Expansion Area
Public Land Survey Sections

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0 2,000 4,000 Feet

Figure 2

PROJECT DETAILED MAP
Proposed 16 Line Reroute
Saint Louis County, MN

Barr Footer: ArcGIS 10.2.2, 2015-01-15 12:19 File: I:\Projects\23691\1592\Maps\Reports\20141209_Route_Permit_Application\Figure 2 - Project Detailed Map.mxd User: jrv

This Application is submitted pursuant to the Alternative Permitting Process outlined in Minn. R., parts 7850.2800 to 7850.3900. The proposed 115 kV HVTL is eligible for consideration under the Alternative Permitting Process under Minn. Stat. § 216E.04, subd. 2(3), and Minn. R., parts 7850.2800 to 7850.3900 (*see* Minn. R., part 7850.2800, subpart 1(C)) because the proposed Project is between 100 and 200 kV. The Applicant respectfully requests that the Commission approve the proposed Route Location, and authorize a route width of 500 feet for the 115 kV HVTL.

1.2 Completeness Checklist

The content requirements for an application with the Commission under the Alternative Permitting Process are identified under Minn. Stat. § 216E.04, subd. 2(3) and Minnesota Rules, parts 7850.1900, 7850.1700, and 7850.3100. The rule requirements are listed in Table 1 with references indicating where the information can be found in this Application.

Table 1 Completeness Checklist

Authority	Required Information	Route Permit Application Section
Minn. R., part 7850.2800, subparts 1(C) and (D)	**Subpart 1. Eligible Projects**	
	An applicant for a site permit or a route permit for one of the following projects may elect to follow the procedures of parts 7850.2800 to 7850.3900 instead of the full permitting procedures in part 7850.1700 to 7850.2700: (C) HVTLs of between 100 kV and 200 kV;	2.5
Minn. R., part 7850.2800, subpart 2	**Subpart 2. Notice to Commission**	
	An applicant for a permit for one of the qualifying projects in subpart 1, who intends to follow the procedures of parts 7850.2800 to 7850.3700, shall notify the PUC of such intent, in writing, at least 10 days before submitting an application for the projects.	2.6 and Appendix A
Minn. R., part 7850.3100	**Contents of Application (alternative permitting process)**	
	The applicant shall include in the application the same information required in part 7850.1900, except the applicant need not propose any alternative sites or routes to the preferred site or route. If the applicant has rejected alternative sites or routes, the applicant shall include in the application the identity of the rejected sites or routes and an explanation of the reasons for rejecting them.	4.3

Authority	Required Information	Route Permit Application Section
Minn. R., part 7850.1900, subpart 2 (applicable per Minn. R., part7850.3100)	**Route Permit for HVTL**	
A.	A statement of proposed ownership of the facility at the time of filing the application and after commercial operation	2.1
B.	The precise name of any person or organization to be initially named as permittee or permittees and the name of any other person to whom the Route Permit may be transferred if transfer of the Route Permit is contemplated.	2.3
C.	At least two proposed routes for the proposed HVTLs and identification of the preferred route and the reasons for the preference.	Not applicable, per Minn. R., part 7850.3100 However, see 4.3.
D.	A description of the proposed HVTL and all associated facilities including the size and type of the HVTL.	3.2, 4.1, 4.4, 5.1.1
E.	The environmental information required under part 7850.1900, subpart 3	Section 6.0 see Minn. R., part 7850.1900, subpart 3 (A) - (H)
F.	Identification of land uses and environmental conditions along the proposed routes.	Section 6.0
G.	The names of each owner whose property is within any of the proposed routes for the HVTL.	Appendix C
H.	United States Geological Survey topographical maps or other maps acceptable to the chair showing the entire length of the HVTL on all proposed routes.	Appendix B
I.	Identification of existing utility and public rights-of-way (ROWs) along or parallel to the proposed routes that have the potential to share ROW, the land used by a public utility (as for a transmission line), with the proposed line.	4.2.2, 5.1.3
J.	The engineering and operational design concepts for the proposed HVTL, including information on the electric and magnetic fields of the transmission line.	Section 5.0
K.	Cost analysis of each route, including the costs of constructing, operating, and maintaining the HVTL that are dependent on design and route.	3.5, 5.1.7
L.	A description of possible design options to accommodate expansion of the HVTL in the future.	4.4
M.	The procedures and practices proposed for the acquisition and restoration of the ROW, construction, and maintenance of the HVTL.	5.1.3-5.1.7
N.	A listing and brief description of federal, state, and local permits that may be required for the proposed HVTL.	7.5

Authority	Required Information	Route Permit Application Section
Minn. R., part 7850.1900, subpart 3	**Environmental Information**	
A.	A description of the environmental setting for each site or route.	6.1
B.	A description of the effects of construction and operation of the facility on human settlement, including, but not limited to, public health and safety, displacement, noise, aesthetics, socioeconomic impacts, cultural values, recreation and public services.	6.2
C.	A description of the effects of the proposed HVTL on land-based economies, including but not limited to, agriculture, forestry, tourism, and mining.	6.3
D.	A description of the effects of the proposed HVTL on archaeological and historic resources.	6.4
E.	A description of the effects of the proposed HVTL on the natural environment, including effects on air and water quality resources and flora and fauna.	6.5
F.	A description of the effects of the proposed HVTL on rare and unique natural resources.	6.6
G.	Identification of human and natural environmental effects that cannot be avoided if the proposed HVTL is approved at a specific site or route.	Section 6.0
H.	A description of measures that might be implemented to mitigate the potential human and environmental impacts identified in items A to G and the estimated costs of such mitigation measures.	Section 6.0

2.0 Introduction

2.1 Statement of Ownership

The proposed 115 kV HVTL would be constructed, owned, and operated by Minnesota Power. Minnesota Power, a division of ALLETE Inc., is an investor-owned utility headquartered in Duluth, Minnesota. The Company provides electricity in a 26,000-square-mile electric service territory located in northeastern Minnesota. Minnesota Power supplies retail electric service to 144,000 customers in northern Minnesota, and wholesale electric service to 16 municipalities in Minnesota. The proposed Project would be located in Minnesota Power's service area and would connect to Minnesota Power's existing transmission facilities. Minnesota Power's transmission network is interconnected with the regional transmission grid to promote reliability and Minnesota Power is a member of the Midwest Reliability Organization and the Midcontinent Independent System Operator (MISO).

2.2 Requested Action

This Application is submitted under the Alternative Permitting Process under Minn. Stat. § 216E.04, subd. 2(3) and Minn. R., parts 7850.2800 to 7850.3900 (*see* Minn. R., part 7850.2800, subpart 1(C)). While the rules do not require consideration of alternate routes in the Application (*see* Minn. R., part 7850.3100), the Applicant's evaluation of alternatives during the development of the proposed Route Location is contained in this Application (Section 4.3).

For reasons identified in subsequent sections of this Application, the Applicant believes the proposed Route for constructing the proposed 115 kV HTVL is the best route for the project. The Applicant respectfully requests that the Commission approve the proposed Route and authorize a route width of 500 feet for the 115 kV HVTL.

This Application demonstrates that construction of the proposed Project along the proposed route would comply with the applicable standards and criteria set out in Minn. Stat. § 216E.03, subd. 7 and Minn. R., part 7850.4100. The proposed Project would support the State's goals to conserve resources, minimize environmental and human settlement impacts and land use conflicts, and ensure the State's electric energy security through the construction of efficient, cost-effective infrastructure.

2.3 Permittee

The permittee for the proposed Project is:

Permittee:	Minnesota Power
Contact:	Daniel McCourtney Senior Environmental Compliance Specialist
Address:	Minnesota Power 30 West Superior Street Duluth, MN 55802
Phone:	(218) 355-3515
E-mail:	dmccourtney@ALLETE.com

2.4 Certificate of Need

Minn. Stat. § 216B.243, subd. 2 states that "no large energy facility" shall be sited or constructed in Minnesota without the issuance of a Certificate of Need by the Commission. The proposed Project does not meet the definition of a "large energy facility" under Minn. Stat. § 216B.2421. While the proposed Project is a HVTL with a capacity of 100 kV or more, it is not more than 10 miles long in Minnesota and it does not cross a state line (Minn. Stat. § 216B.2421 subd. 2(3)). Therefore, a Certificate of Need is not required for the proposed Project. The proposed Project also meets the exemption requirements of Minn. Stat. § 216B.243, subd. 8(2) since the line is to meet the needs of a single customer.

2.5 Route Permit, Alternative Permitting Process

The Minnesota Power Plant Siting Act (PPSA) states that no person may construct an HVTL without a Route Permit from the Commission (Minn. Stat. § 216E.03, subd. 2). Under the PPSA, an HVTL is considered to be a transmission line that is 100 kV or more and is greater than 1,500 feet in length (Minn. Stat. § 216E.01, subd. 4). The proposed Project is capable of operating at more than 100 kV and is greater than 1,500 feet in length. A Route Permit is, therefore, required from the Commission prior to construction. The proposed Project qualifies for review under the Alternative Permitting Process authorized by Minn. Stat. § 216E.04, subd. 2(3) and Minn. R., part 7850.2800, subpart 1(C). Accordingly, the Applicant is following the provisions of the Alternative Permitting Process outlined in Minn. R., parts 7850.2800 to 7850.3900 for this proposed Project.

2.6 Notice to the Commission

The Applicant notified the Commission on November 17, 2014 by letter sent via the U.S. Postal Service and e-filed that the Applicant intends to use the Alternative Permitting Process for the proposed Project. This letter complies with the requirement of Minn. R., part 7850.2800, subpart 2, to notify the Commission of this election at least 10 days prior to submitting an application for a Route Permit. A copy of the letter is attached in Appendix A.

3.0 Proposed Project Information

3.1 Proposed Project Location

The proposed Project is located south of Fayal Township and approximately four miles east of McDavitt Township in St. Louis County, Minnesota. Figure 1 shows an overview of the Project area. The proposed Route is shown in Figure 2. Detailed overview maps of the Project area are included in Appendix B of this application. Table 2 identifies the detailed location information for the proposed Project.

Table 2 Detailed Project Location

Township	Range	Section	County
56N	17W	16	St. Louis
56N	17W	17	St. Louis
56N	17W	18	St. Louis
56N	17W	20	St. Louis
56N	17W	21	St. Louis
56N	17W	28	St. Louis
56N	17W	29	St. Louis

3.2 Project Proposal

As shown in Figure 2, the Applicant is proposing to relocate one, approximately three-mile, 115 kV HVTL located south of Fayal Township and approximately four miles east of McDavitt Township in St. Louis County, Minnesota. The key components of the proposed Project include:

- The proposed HVTL would connect to Minnesota Power's existing 16 Line on the east side of United Taconite's existing tailings basin and proceed southeast parallel to an existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line south of the new tailings basin.

- An existing three-mile 115 kV HVTL section would be taken out of service and removed.

Additional detail regarding each of these project elements is provided in Section 4.0.

3.3 Need for Project

United Taconite is planning to extend its existing tailings basin area on their property in 2016. Minnesota Power's existing 16 Line is currently located directly within the footprint of the proposed expansion. To accommodate the proposed tailings basin it is necessary to re-route a three-mile portion of the 115 kV line. The existing line is located on property leased from United Taconite which is requiring Minnesota Power to reroute the HVTL by 2016. Therefore, a timely approval is requested.

3.4 Project Schedule

Construction of the proposed Project is expected to begin in the fourth quarter of 2015, and the Applicant anticipates a first quarter 2016 in-service date for the proposed facilities. Table 3 provides an estimated permitting and construction schedule for the Project. This schedule is based on information available at the date of this filing and planning assumptions that balance the timing of implementation with the availability of crews, materials, and other practical considerations. It was developed with the intention of accommodating United Taconite's current schedule for its tailings basin extension.

Table 3 Estimated Project Schedule

Project Task	Date
File Route Permit Application (Application) with the Commission	1st Quarter 2015
Route Permit Review Process Complete	3rd Quarter 2015
Begin Transmission Line Construction	4th Quarter 2015
In-Service Date	1st Quarter 2016

3.5 Project Costs

The Applicant estimates that the proposed Project would cost approximately $ 4,700,000 to construct. Final cost for the Project is dependent on final route selection, necessary mitigation, and final construction procedures. A more detailed breakdown of the estimated proposed Project cost is shown in Table 4.

Table 4 Estimated Project Cost

Project Item	Cost
Construction of 115 kV Transmission Line Facilities	$ 4,300,000
Removal of Existing 115 kV Line Facilities	$ 400,000
Total Project Cost	$ 4,700,000

Maintenance costs after construction would be nominal for several years, since the proposed transmission line would be new and there would be minimal initial vegetation management required. Typical annual operating and maintenance costs for 115 kV transmission lines across Minnesota Power's Upper Midwest system area are $585 per mile of transmission ROW. The principal operating and maintenance costs include inspections of the transmission ROW, which are usually conducted using fixed-wing aircraft and helicopter on a regular basis.

4.0 Facility Description and Route Selection Rationale

4.1 Transmission Line Description

The proposed Project involves building an approximately three-mile 115kV HVTL. The proposed HVTL would connect to Minnesota Power's existing 16 Line on the east side of United Taconite's existing tailings basin and proceed southeast parallel to an existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line.

The proposed Project also includes the removal of approximately three miles of an existing 115 kV transmission line on H-Frame structures located west of the proposed new line. Removal of the existing 115 kV transmission line will consist of de-energizing the line, taking conductors off of the structures, lifting the poles, cutting the poles off and pushing the remaining pole below grade.

4.2 Route Width and Alignment Selection Process

4.2.1 Route Width

The PPSA directs the Commission to locate transmission lines in a manner that "minimize[s] adverse human and environmental impact while ensuring continuing electric power system reliability and integrity and ensuring their electric needs are met and fulfilled in an orderly and timely fashion" (Minn. Stat. § 216E.02, subd. 1). The PPSA also authorizes the Commission to meet its routing responsibility by designating a "route" for a new transmission line when it issues a Route Permit. The route may have "a variable width of up to 1.25 miles" within which the ROW for the facilities can be located (Minn. Stat. § 216E.01, subd. 8).

The proposed Route width is 500-feet and the proposed ROW measures 100 feet wide. Due to the engineering challenges associated with the proposed Project, including topography, the Applicant is requesting a 500-foot route width to allow adequate flexibility in developing a final alignment.

4.2.2 Route Selection Process

The Applicant developed the proposed Route with consideration of the statutory and rule criteria set forth in the PPSA and Minn. R., part 7850.4100 as well as to the State of Minnesota's practice of non-proliferation of new infrastructure routes. The proposed route, as shown in Figure 1, represents the route with the least potential impacts on private residences and private, non-corporate, landowners. The Applicant also solicited input from interested stakeholders and landowners, including local, state, and federal agencies. In addition, the Applicant assessed existing utility and public ROWs to identify opportunities for ROW sharing and constraints for alignment and pole placement. Approximately 1.25 miles of the proposed HVTL would align with an existing railway to maximize ROW sharing. Figure 2 shows existing electric transmission line infrastructure in the Project area.

Early in the planning process, the Applicant assessed the general area surrounding the proposed Project to identify significant routing issues that might arise and to evaluate environmental resources in the

vicinity of the proposed Project. A team of siting, ROW, planning, environmental, ecological, and engineering personnel worked together to develop the proposed Route that minimizes overall impacts of the proposed Project while still fulfilling the Project purpose.

4.3 Alternate Route Segments Considered and Rejected

A route as defined under Minn. Stat. § 216E.01, subd. 8 and Minnesota Rules, part 7850.1000, subp. 16 is the location of a HVTL between two end points. The route may have a variable width of up to 1.25 miles. For this proposed Project, the Applicant is requesting a 500-foot route width. The range of potential routes considered by the Applicant for the proposed Project was constrained by a need to connect to existing infrastructure and the small geographic area of the proposed Project. Because of engineering constraints associated with getting proper clearances around existing and proposed infrastructure, there was no need for the Applicant to consider routes other than the one proposed.

4.4 Design Options to Accommodate Future Expansion

The proposed HVTL will have the same capacity as the overall 16 Line. Because the Project affects only a small section of the 16 Line, increasing its capacity would not provide accommodation for future expansion.

5.0 Engineering Design, Construction and ROW Acquisition

5.1 Structures, ROW, Construction and Maintenance

5.1.1 Transmission Structures

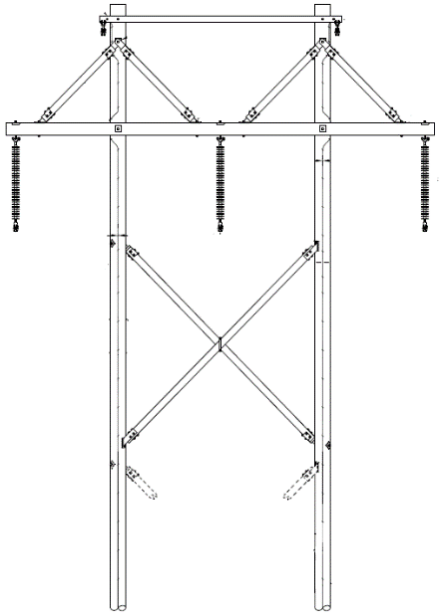
The proposed Project would use H-Frame and three Pole Angle structure types as appropriate. The specifications of these structures are included in Table 5 and presented in Figure 3.

Table 5 Structure Design Summary

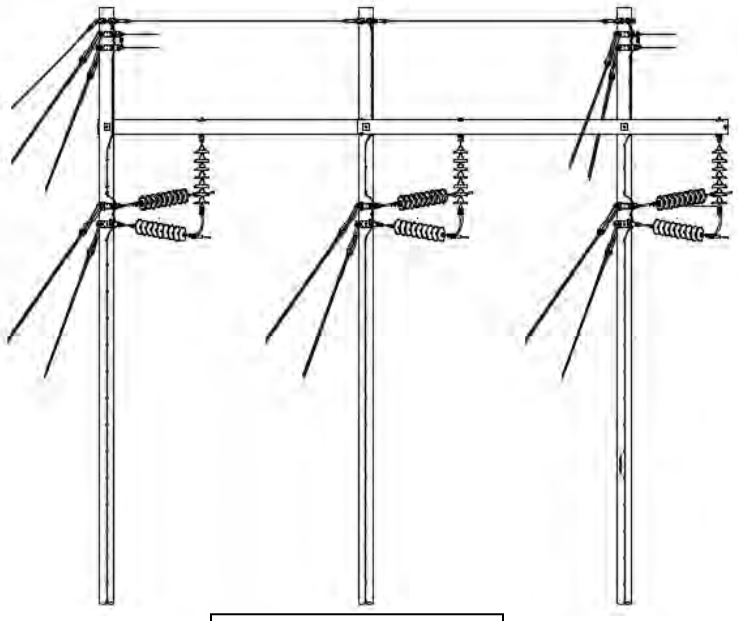
Line Type	Structure Type	Structure Material	Typical ROW Width (feet)	Approximate Structure Height (feet)	Structure Base Diameter (inches)	Foundation Diameter (feet)	Span Between Structures (feet)
Single Circuit 115 kV	H-Frame	Wood	100	Ranges from 60-75	Ranges from 16-32	Wood: direct embed	Ranges from 500-8 00
Single Circuit 115 kV	Three Pole Angle Structure	Wood	100	Ranges from 60-75	Ranges from 16-32	Wood: direct embed	No span

The proposed transmission line would be designed to meet or surpass relevant local and state codes including the National Electric Safety Code (NESC) and Company standards. Appropriate standards will be met for construction and installation, and applicable safety procedures will be followed during and after installation.

Figure 3 Typical 115 kV Typical H-Frame Structure



Typical H-Frame Structure



Typical Three Pole Angle Structure

5.1.2 Right-of-Way Width

The proposed new 115 kV HVTL would require a 100-foot ROW. When the transmission line is placed cross-country across private land, an easement for the entire ROW would be acquired from the affected landowner(s). Minnesota Power would locate the poles as close to property division lines as reasonably possible.

5.1.3 Right-of-Way Evaluation and Acquisition

The proposed project would require approximately three miles of new ROW. For HVTLs, utilities acquire easement rights across certain parcels to accommodate the facilities. The ROW acquisition process begins early in the detailed design process. The evaluation and acquisition process includes examining titles, contacting owners, surveying, preparing documents and purchasing the ROW. Each of these activities, particularly as it applies to easements for transmission line facilities, is described in more detail below.

The first step in the right-of-way process is to identify all persons and entities that may have a legal interest in the real estate upon which the facilities will be built. To compile this list, a right-of-way agent or other persons engaged by the utility will complete a public records search of all land involved in the Project to determine the legal description of the property and the owner(s) of record, and to gather

information regarding easements, liens, restriction, encumbrances, and other conditions of record as needed.

After owners are identified, a right-of-way representative will contact each property owner or the property owner's representative. The right-of-way agent will describe the need for the transmission facilities and how the Project may affect each parcel. The right-of-way agent will also inquire from the landowner information about any specific construction concerns.

The next step in the acquisition process is evaluation of the specific parcel. For this work, the right-of-way agent may request permission from the owner for survey crews to enter the property to conduct preliminary survey work. Permission may also be requested to take soil borings to assess the soil conditions and determine appropriate foundation design. Surveys are conducted to locate the right-of-way corridors, natural features, man-made features, and associated elevations for use during the detailed engineering of the line. The soil analysis is performed by an experienced geotechnical testing laboratory.

During the evaluation process, the location of the proposed HVTL may be staked with permission of the property owner. This means that the survey crew will locate each structure or pole on the ground and place a surveyor's stake to mark the structures' anticipated location. By doing this, the right-of-way agent can show the landowner where the structure(s) will be located on the property. The right-of-way agent may also delineate the boundaries of the easement area required for safe operation of the line.

Prior to the acquisition of easements of property, land value data will be collected. Based on the impact of the easement or purchase to the market value of each parcel, a fair market value offer will be developed. The right-of-way agent will contact the property owner to present the offer for the easement and discuss the amount of just compensation for the rights to build, operate, and maintain the transmission facilities within the easement area and reasonable access to the easement area. The agent will also provide maps of the line route or site and maps showing the landowner's parcel. The landowner is allowed a reasonable amount of time to consider the offer and to present any material that the owner believes is relevant to determining the property's value.

In nearly all cases, utility companies are able to work with the landowners to address their concerns and an agreement is reached for the utility's purchase of land rights. The right-of-way agent will prepare the easements required to complete each transaction. In rare instances where a negotiated settlement cannot be reached, the landowner may choose to have an independent third party determine the value of the rights taken. Such valuation is made through the utility's exercise of the right of eminent domain pursuant to Minnesota Statutes, Chapter 117. The process of exercising the right of eminent domain is called condemnation.

Before commencing a condemnation proceeding, the right-of-way agent must obtain at least one appraisal for the property proposed to be acquired and a copy of that appraisal must be provided to the

property owner per Minnesota Statute § 117.036, subd. 2(a). The property owner may also obtain another property appraisal and the company must reimburse the property owner for the cost of the appraisal according to the limits set forth in Minnesota Stat. § 117.036, subd. 2(b). The property owner may be reimbursed for reasonable appraisal costs up to $1,500 for single-family and two-family residential properties, $1,500 for property with a value of $10,000 or less, and $5,000 for other types of properties.

To start the formal condemnation process, a utility will file a petition in the district court where the property is located and serves that Petition on all owners of the property. If the court grants the petition, the court will appoint a three-person condemnation commission that will determine the compensation for the easement. The three people must be knowledgeable of applicable real estate issues. Once appointed, the commissioners will schedule a viewing of the property over and across which the HVTL easement is to be located. Next, the commission will schedule a valuation hearing where the utility and landowners can testify as to the fair market value of the easement or fee. The commission will then make an award as to the value of the property acquired and file it with the court. Each party has 40 days from the filing of the award to appeal to the district court for a jury trial. In the event of an appeal, the jury will hear land value evidence and render a verdict. At any point in this process, the case can be dismissed if the parties reach a settlement.

As part of the right-of-way acquisition process, the right-of-way agent will discuss the construction schedule and construction requirements with the owner of each parcel. To ensure safe construction of the line, special consideration may be needed for fences, crops, or livestock. For instance, fences may need to be moved, temporary or permanent gates may need to be installed; crops may need to be harvested early; and livestock may need to be moved. In each case the right-of-way agent and construction personnel coordinate these processes with the landowner.

5.1.4 Construction Procedures

Minnesota Power would begin construction after appropriate federal, state, and local approvals are obtained, property and ROWs are acquired, soil conditions are established, and a final design is completed. The precise timing of construction would take into account various requirements that may be in place due to permit conditions, system loading issues, and available workforce.

Minnesota Power's construction process would follow standard construction and mitigation practices, including best management practices (BMPs) that were developed from experience with past projects. These practices address staging, erecting HVTL structures, and stringing HVTLs. Construction and mitigation practices to minimize impacts would be developed by Minnesota Power based on the proposed schedule for activities, permit requirements, prohibitions, maintenance guidelines, inspection procedures, terrain, and other factors. In some cases, activities or schedules may be modified to minimize impacts on sensitive environmental features.

HVTL structures are generally designed for installation at existing grades. However, some sloped work areas may need to be graded or filled in order to establish a more level work surface for structure installation. If the landowner permits, it is preferred to leave the leveled areas and working pads in place for use in future maintenance activities, if any. If permission is not obtained, the site is graded back to its original condition to the extent feasible and imported fill is removed.

Typical construction equipment that may be used for the proposed Project includes tree removal equipment, line construction equipment, stringing equipment, and general construction equipment on rubber tires or tracks, as appropriate. Staging areas are often established for the proposed Project, which are required for accommodating the equipment and materials necessary to construct the new HVTL facilities. The materials are stored at staging areas until they are needed for the proposed Project.

Minnesota Power may also require staging areas for additional space for storage during construction. These areas have not been identified at this time, but would typically be selected for their location, access, security, and ability to efficiently and safely warehouse supplies. The temporary staging areas outside of the ROW would be obtained by Minnesota Power through rental agreements. Minnesota Power will obtain a Conditional Use Permit, if necessary, for staging areas located outside of the proposed route.

Minnesota Power would access the ROW from existing roads or trails that run parallel or perpendicular to the ROW. In some situations, private field roads or trails may be used. Where necessary to accommodate the heavy equipment used in construction, including cranes, cement trucks, and hole-drilling equipment, existing access roads may be upgraded or new roads may be constructed. New access roads may also be constructed when no current access is available or the existing access is inadequate to cross roadway ditches. To the extent possible, Minnesota Power would coordinate these activities with the affected property owner(s) and/or state and local highway departments as appropriate.

Structure installation first begins by moving structures from the staging areas and delivering them to a staked location. The structures are typically staged within the ROW until the structure is set. Depending on site conditions, structures may be framed in the ground and lifted into place, or the structures may be set first and then bracing and hardware attached.

Most structures would be direct embedded. The area around the structure is then backfilled with crushed rock and/or soil. In lowland areas with poor soil capacity, Minnesota Power would use galvanized steel culverts to increase structure stability.

Angle structures as well as some tangent structures would typically be guyed. Guy wires would be anchored using screw anchors, cross plate anchors, or rock anchors depending on the soil conditions encountered.

After the structures have been assembled, set, and secured, conductors would be installed by establishing stringing setup areas along the route. The conductors would then be pulled with a rope lead that connects to each structure through dollies attached at the insulator locations.

Environmentally sensitive areas (e.g., wetlands) may require special construction techniques, which may vary according to conditions at the time of construction. During construction, impacts on wetland areas will be minimized by Minnesota Power to the extent possible. Additionally, Minnesota Power will use construction practices that help prevent soil erosion and will take measures to ensure that equipment fueling and lubricating will occur at a distance from waterways. Additional mitigative measures relating to wetlands are contained in Section 6.5.2.2.

5.1.5 Transmission Line Removal Procedures

The proposed Project includes the removal of approximately three miles of existing 115 kV HVTL to accommodate United Taconite's tailings basin addition. This existing line is located up to one mile west of the Project location. Transmission removal will begin with the removal of conductors. Conductors will be removed by hanging dollies at the insulator locations and using rope leads to pull the conductor from the existing H-Frame structures. The conductor will be wound on reels and salvaged. Next, line hardware will be removed from the structures. Structure removal will consist of lifting the poles, cutting them off, pushing the remaining pole below grade and using fill to bring the pole site up to grade.

5.1.6 Restoration Procedures

Minnesota Power will attempt to limit ground disturbance during construction wherever possible. However, disturbance is anticipated to occur during the normal course of work, which is estimated to take several weeks. As construction is completed (or when weather permitts), Minnesota Power would restore disturbed areas to their original condition to the maximum extent practicable. Some restoration may not be performed consecutively with the completion of construction, but would be done as soon as conditions practicably allow. The ROW agents would attempt to contact each property owner after construction is completed to assess if any remaining damage has occurred as a result of the proposed Project. If damage has occurred to crops, fences or the property, Minnesota Power would fairly reimburse the landowner for the damages sustained that are not repaired or restored by Minnesota Power or its representatives. In some cases, Minnesota Power may engage an outside contractor to restore the damaged property as nearly as possible to its original condition.

Portions of vegetation that are disturbed or removed during construction of the HVTLs would naturally reestablish to pre-disturbance conditions. Species of common grasses and shrubs typically reestablish with few problems after disturbance. Areas with significant soil compaction and disturbance from construction activities along the proposed HVTL route may require assistance in reestablishing the vegetation stratum and controlling soil erosion. Commonly used methods to control soil erosion and assist in reestablishing vegetation include re-seeding and mulching, erosion control blankets, silt fence

installation, and minimizing soil disturbance during construction. To avoid adversely impacting reptile and bird species, Minnesota Power would not use plastic mesh erosion control materials.

These erosion control and vegetation establishment practices are regularly used in construction projects and are referenced in the construction permit plans. These construction techniques typically minimize long-term impacts that may result from the proposed Project.

The Minnesota Noxious Weed Law (Minn. Stat. § 18.75-18.91) defines a noxious weed as an annual, biennial, or perennial plant that the Commissioner of Agriculture designates to be injurious to the public health, the environment, public roads, crops, livestock, or other property. The Minnesota Department of Agriculture's Noxious & Invasive Weed Program assists local governments and landowners with resources for managing noxious and invasive weeds throughout Minnesota. Minnesota Power would attempt to limit the spread of noxious and invasive weeds by cleaning construction equipment before it enters the construction work area and using only invasive-free mulches, topsoil, and seed mixes. Permanent vegetation would be established in areas disturbed within the construction work area except in actively cultivated areas and standing water wetlands. Seed used would be purchased on a "Pure Live Seed" basis for seeding re-vegetation areas. The seed tags on the seed sacks would also certify that the seed is "Noxious Weed Free."

Minnesota Power may use both herbicides and/or mechanical methods to control the spread of noxious weeds. All herbicides used by Minnesota Power are approved by the Environmental Protection Agency and the State of Minnesota Department of Agriculture. These herbicides are applied by commercial pesticide applicators that are licensed by the Minnesota Department of Agriculture. If during post-construction monitoring of the restored ROW a higher density and cover of noxious weeds on the ROW is noted when compared to adjacent off ROW areas, Minnesota Power would obtain landowner permission and work to mitigate noxious weed concerns.

5.1.7 Maintenance Procedures

Transmission lines are designed to operate for decades and require only moderate maintenance, particularly in the first few years of operation.

The estimated service life of the proposed transmission line for accounting purposes is approximately 40 years. However, practically speaking, HVTLs are seldom completely retired. Transmission infrastructure has very few mechanical elements and is built to withstand weather extremes that are normally encountered. With the exception of severe weather such as tornadoes and heavy ice storms, transmission lines rarely fail. Should the transmission lines be completely retired, Minnesota Power would remove them according to the terms detailed in the Project's easement and leasing agreements.

Transmission lines are automatically taken out of service by the operation of protective relaying equipment when a fault is sensed on the system. Such interruptions are usually only momentary.

Scheduled maintenance outages are also infrequent. As a result, the average annual availability of transmission infrastructure is very high, in excess of 99 percent.

The principal operating and maintenance cost for transmission facilities is the cost of inspections, which is usually done monthly by air. Annual operating and maintenance costs for transmission lines in Minnesota and surrounding states vary, however, for 115 kV, past experience shows that costs are approximately $585 per mile. Actual line-specific maintenance costs depend on the setting, the amount of vegetation management necessary, storm damage occurrences, structure types, materials used, and the age of the line.

5.2 Electric and Magnetic Fields

The term EMF refers to electric and magnetic fields that are coupled together, such as in high frequency radiating fields. For the lower frequencies associated with power lines (referred to as "extremely low frequencies" (ELF)), EMF should be separated into electric fields (EFs) and magnetic fields (MFs), measured in kilovolts per meter (kV/m) and milliGauss (mG), respectively. These fields are dependent on the voltage of a transmission line (EFs) and current carried by a transmission line (MFs). The intensity of the electric field is proportional to the voltage of the line, and the intensity of the magnetic field is proportional to the current flow through the conductors. Transmission lines operate at a power frequency of 60 hertz (cycles per second).

5.2.1 Health and Environmental Effects

Considerable research has been conducted in recent decades to determine whether exposure to power-frequency (60 Hz) electric and MFs can cause biological responses and adverse health effects. The multitude of epidemiological and toxicological studies has shown at most a weak association (i.e., no statistically significant association) between EMF exposure and health risks.

In 1999, the National Institute of Environmental Health Sciences (NIEHS) issued its final report on "Health Effects from Exposure to Power-Line Frequency Electric and Magnetic Fields" in response to the Energy Policy Act of 1992. In the report, the NIEHS concluded that the scientific evidence linking EMF exposures with health risks is weak and that this finding does not warrant aggressive regulatory concern. However, in light of the weak scientific evidence supporting some association between EMF and health effects and the fact that exposure to electricity is common in the United States, the NIEHS stated that passive regulatory action, such as providing public education on reducing exposures, is warranted.

The United States Environmental Protection Agency (USEPA) seems to have come to a similar conclusion about the link between adverse health effects, specifically childhood leukemia, and power-frequency EMF exposure. On its website, the USEPA states:

> Many people are concerned about potential adverse health effects. Much of the research about power lines and potential health effects is inconclusive. Despite more than two decades of research to determine whether elevated EMF exposure, principally

> to magnetic fields, is related to an increased risk of childhood leukemia, there is still no definitive answer. The general scientific consensus is that, thus far, the evidence available is weak and is not sufficient to establish a definitive cause-effect relationship.

Minnesota, California, and Wisconsin have each conducted their own literature reviews or research to examine this issue. In 2002, Minnesota formed an Interagency Working Group to evaluate the research and develop policy recommendations to protect the public health from any potential problems arising from EMF effects associated with HVTLs. The Minnesota Department of Health published the Working Group's findings in "A White Paper on Electric and Magnetic Field (EMF) Policy and Mitigation Options." The Working Group summarized its findings as follows:

> Research on the health effects of EMF has been carried out since the 1970's. Epidemiological studies have mixed results – some have shown no statistically significant association between exposure to EMF and health effects, some have shown a weak association. More recently, laboratory studies have failed to show such an association, or to establish a biological mechanism for how magnetic fields may cause cancer. A number of scientific panels convened by national and international health agencies and the United States Congress have reviewed the research carried out to date. Most researchers concluded that there is insufficient evidence to prove an association between EMF and health effects; however many of them also concluded that there is insufficient evidence to prove that EMF exposure is safe.

Based on findings like those of the Working Group and NIEHS, the Commission has consistently found that "there is insufficient evidence to demonstrate a causal relationship between EMF exposure and any adverse human health effects." This conclusion was further justified in the recent Route Permit proceedings for the Brookings County – Hampton 345 kV Project ("Brookings Project"). In the Brookings Project Route Permit proceedings, the Applicants (Great River Energy and Xcel Energy) and one of the intervening parties both provided expert evidence on the potential impacts of electric and magnetic fields on human health. The administrative law judge (ALJ) in that proceeding evaluated written submissions and a day-and-a-half of testimony from the two expert witnesses. The ALJ concluded: "there is no demonstrated impact on human health and safety that is not adequately addressed by the existing State standards for [EMF] exposure." The Commission adopted this finding in its September 14, 2010 order for the Brookings Project.

5.2.2 Electric Fields

While there is no official state or federal standard for transmission line EFs, the Environmental Quality Board (EQB) developed a guideline of a maximum EF limit of 8 kV/m measured at one meter above the ground that has been incorporated into subsequent Route Permits by the Commission. The guideline was designed to prevent serious hazards from shocks when touching large objects parked under alternative current (AC) transmission lines of 500 kV or greater. Table 6 provides the EFs at maximum conductor voltage for the proposed Project. The EF calculations are also shown graphically in Figure 5.

Maximum conductor voltage is defined as the nominal voltage plus ten percent. This is generally an emergency condition, and Minnesota Power typically operates its transmission system between 101 percent and 104 percent of nominal voltage under normal conditions.

Due to the conductor configuration of the single circuit 115 kV H-Frame type structure, the maximum EF for this configuration actually occurs at approximately 16 feet from the centerline of the ROW. The maximum EF was calculated to be 1.55 kV/m at one meter above ground. The maximum EF value for this configuration is not reflected in Table 6.

Table 6 Calculated Electric Fields (kV/m) for Proposed Transmission Line Designs One Meter (3.28 feet) above ground

Structure Type	Maximum Operating Voltage (kV)	Distance to Proposed Centerline (feet) of ROW												
		-300	-200	-100	-75	-50	-25	0	25	50	75	100	200	300
115 kV H-Frame	126.5	0.00	0.01	0.07	0.15	0.42	1.31	0.50	1.31	0.42	0.15	0.07	0.01	0.00

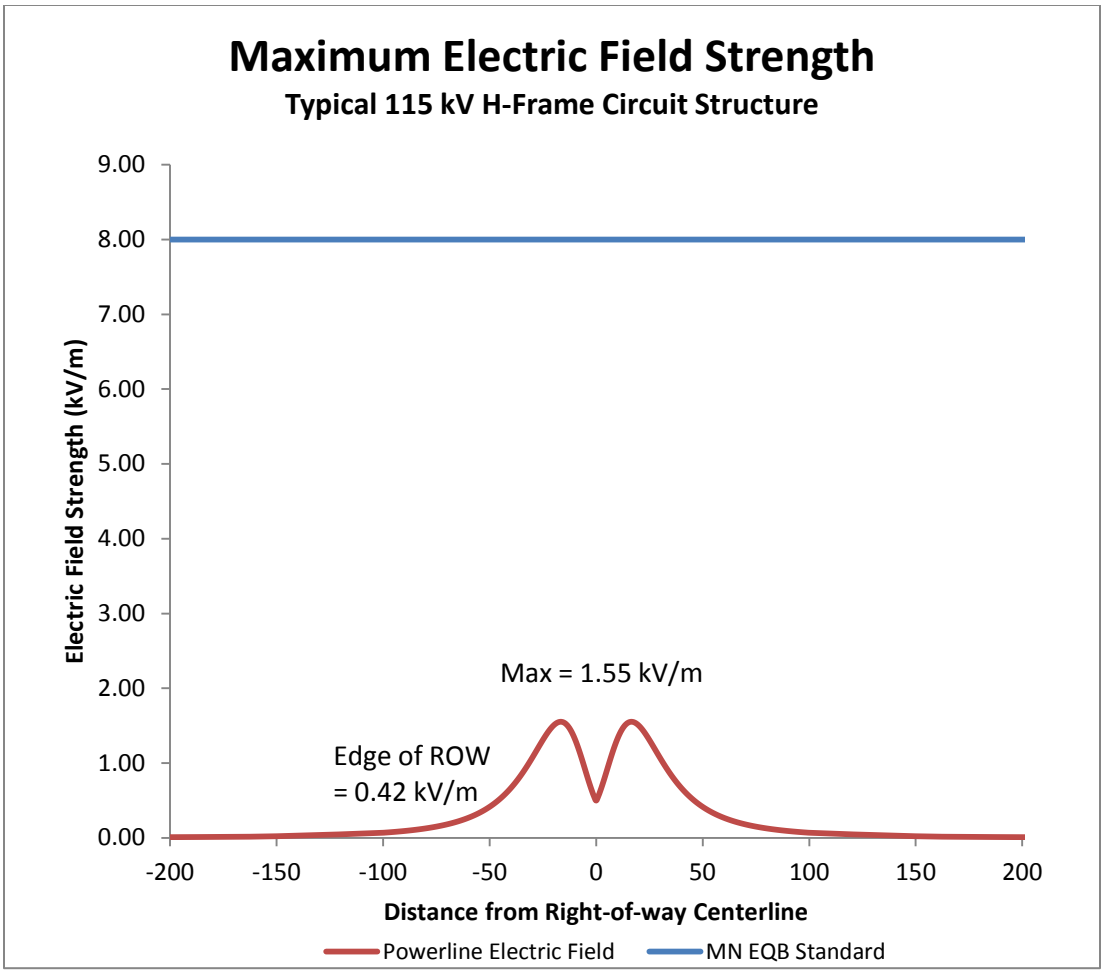


Figure 5 Calculated Electric Fields (kV/m) for Proposed Transmission Line Designs One Meter (3.28 Feet) above ground

5.2.3 Magnetic Fields

There are presently no federal or Minnesota regulations pertaining to MF exposure. The EQB and the Commission have recognized that Florida (a 150 mG limit) and New York (a 200 mG limit) are the only two state standards in the country. Recent studies of the health effects from power frequency fields conclude that the evidence of health risk is weak[1][2][3]. The general standard is one of prudent avoidance. The Applicant provides information to the public, interested customers and employees so they have an understanding of the MFs associated with the proposed Project.

The MF profiles around the proposed transmission line for each structure and conductor configuration being considered for the proposed Project are shown in Table 7. MFs were calculated at the conductor's thermal limit based on the design of the HVTL and at the expected peak loading on the lines based on power flow modeling of the transmission system. The peak MF values are calculated at a point directly under the HVTL and where the conductor is closest to the ground. The same method is used to calculate

the MF at the edge of the ROW. MF profile data show that MF levels generally decrease rapidly as the distance from the centerline increases.

Due to the conductor configuration of the single circuit 115 kV H-Frame type structure, the peak MF for this configuration actually occurs at the centerline of the ROW. This peak MF was calculated to be 104.90 mG under the conductor thermal limit condition and 70.69 mG under the expected peak loading condition.

Because the actual power flow on a transmission line could potentially vary widely throughout the day depending on electric demand, the actual MF level could also vary widely from hour to hour. In any case, the typical loading of the transmission line would be far below the thermal limit of the line and should remain at or below the expected peak loading for the foreseeable future, resulting in typical MFs well below those indicated in Table 7. The magnetic fields calculations are also shown graphically in Figures 6 and 7.

Table 7 Calculated Magnetic Fields (mG) for Proposed Transmission Line Design

Structure Type	Current (Amps)	Distance to Proposed Centerline (feet) of ROW												
		-300	-200	-100	-75	-50	-25	0	25	50	75	100	200	300
Magnetic Field Profile at Conductor Thermal Limits														
115 kV H-Frame	461.9	0.64	1.43	5.61	9.73	20.41	56.21	104.90	56.21	20.41	9.73	5.61	1.43	0.64
Magnetic Field Profile at Expected Peak Loading														
115 kV H-Frame	311.3	0.43	0.97	3.78	6.56	13.75	37.88	70.69	37.88	13.75	6.56	3.78	0.97	0.43

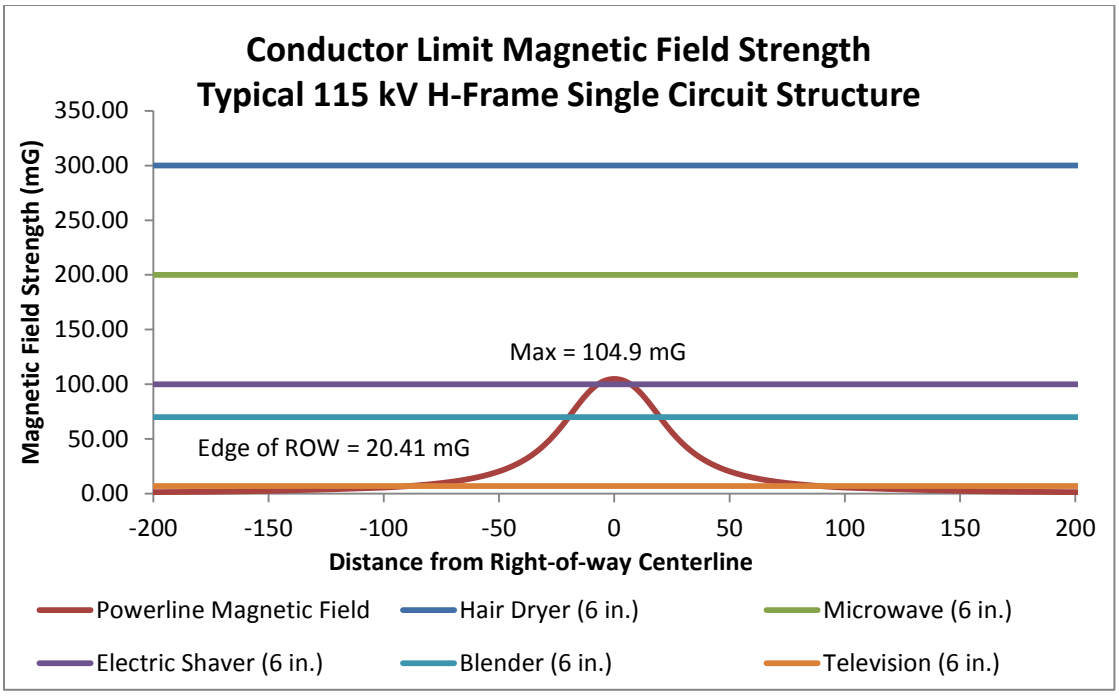


Figure 6 Conductor Limit Magnetic Field Strength

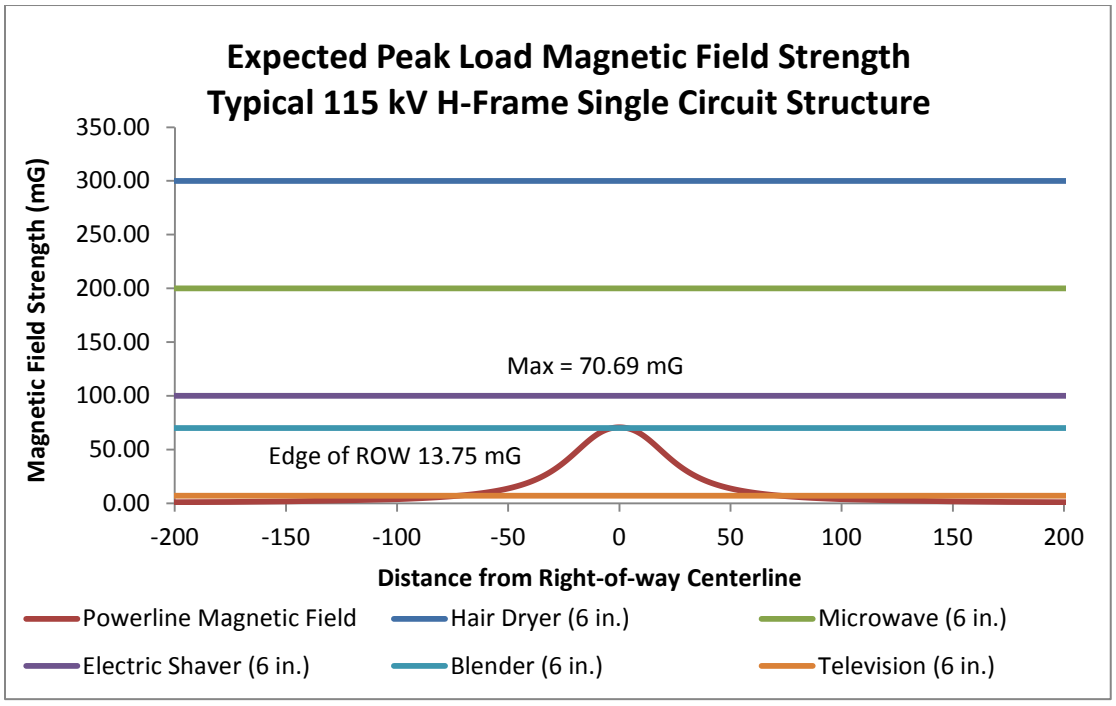


Figure 7 Expected Peak Load Magnetic Field Strength

5.2.4 Stray Voltage

Stray voltage is a voltage that exists between the neutral wire of the service entrance and grounded objects in buildings, such as barns and milking parlors, and can occur on the electric service entrances to structures from distribution lines, not HVTLs. HVTLs do not, by themselves, create stray voltage because they do not connect to businesses or residences. HVTLs, however, can induce stray voltage on a distribution circuit that is parallel to and immediately under the HVTL. Appropriate measures would be taken to prevent stray voltage problems when the proposed HVTL parallels or crosses distribution lines.

5.2.5 Farm Operations, Vehicle Use and Metal Buildings Near Power Lines

Insulated electric fences used in livestock operations can pick up an induced charge from transmission lines. Usually, the induced charge will drain off when the charger unit is connected to the fence. When the charger is disconnected either for maintenance or when the fence is being built, shocks may result. Potential shocks can be prevented by using a couple of methods including:

- one or more of the fence insulators can be shorted out to ground with a wire when the charger is disconnected; or
- an electric filter can be installed that grounds out charges induced from a power line while still allowing the charger to be effective.

Farm equipment, passenger vehicles, and trucks may be safely used under and near power lines. The power lines would be designed to meet or exceed minimum clearance requirements over roads, driveways, cultivated fields, and grazing lands specified by the NESC. Recommended NESC clearances are designed to accommodate a relative vehicle height of 14 feet. Minnesota Power will design the Project to exceed NESC minimum clearances.

There is a potential for vehicles under HVTLs to build up an electric charge. If this occurs, the vehicle can be grounded by attaching a grounding strap to the vehicle long enough to touch the earth. Such buildup is a rare event because generally vehicles are effectively grounded through tires. Modern tires provide an electrical path to ground because carbon black, a good conductor of electricity, is added when they are produced. Metal parts of farming equipment are frequently in contact with the ground when plowing or engaging in various other activities. Therefore, vehicles would not normally build up a charge unless they have unusually old tires or are parked on dry rock, plastic or other surfaces that insulate them from the ground.

Buildings are permitted near transmission lines but are generally prohibited within the ROW itself because a structure under a line may interfere with safe operation of the transmission facilities. For example, a fire in a building on the ROW could damage a transmission line. As a result, NESC guidelines establish clear zones for transmission facilities. Metal buildings may have unique issues. For example, metal buildings near power lines of 200 kV or greater must be properly grounded. Any person with

questions about a new or existing metal structure can contact the Applicant for further information about proper grounding requirements.

If a customer suspects that stray voltage/neutral to earth voltage (NEV) is a concern on their property, they can call the Minnesota Power stray voltage hotline 1-800-228-4966 ext. 5031. The customer can contact a Minnesota Power technician or engineer and discuss the situation. If an on-farm investigation is warranted it would be scheduled. On the day of the investigation, the Minnesota Power team would arrive and conduct an investigation of the utility system serving the farm and the farm wiring. The team would discuss the preliminary results with the customer before leaving the farm. In most instances, recording volt meters would be set to measure activity over several days. A few days later these would be retrieved by Minnesota Power for analysis. Upon completing the analysis, a Minnesota Power engineer or technician would call the customer to discuss the results.

6.0 Environmental Information

This section analyzes potential resource impacts associated with the proposed Project. This section provides a description of the environmental setting, potential impacts, and mitigative measures the Applicant proposes, where appropriate, to minimize the impacts of siting, constructing, and operating the proposed Project. If the proposed transmission line was removed in the future, the land would be restored to its prior condition as legally required. The majority of the measures proposed are part of the standard construction process for the Applicant. Unless otherwise identified in the following text, the costs of the mitigative measures proposed are considered nominal.

6.1 Environmental Setting

The proposed Project is located directly south of United Taconite's Tailings Basin situated south of Fayal Township and approximately four miles east of McDavitt Township in St. Louis County, Minnesota. Project is located near mainly vacant land and some existing industrial land use.

The Project area is located within the Northern Minnesota Drift and Lake Plains Section, a section within the biogeographic province known as the Laurentian Mixed Forest Province under the Ecological Classification System (ECS) developed by the Minnesota Department of Natural Resources (MnDNR)[4]. The Project area is located in the Tamarack Lowlands Subsection of the Northern Minnesota Drift and Lake Plains Section, near the transition between the St. Louis Moraines and Toimi Uplands Subsections[4]. The Tamarack Lowlands Subsection is characterized by level to gently rolling topography. The largest landform is a lake plain. Around the edges of the old glacial lake is a till plain (Aurora Till Plain) formed in Superior lobe sediments. There is also a small piece of end moraine north of Sandy Lake that is related to the St. Louis moraines. The most common forest communities include lowland hardwoods and conifers. Additionally, northern hardwood and aspen-birch forests were common on the other portions of this region. Presently, much of the land is in public ownership. Forestry and tourism, along with some agriculture are the most common land uses[4].

6.2 Human Settlement

6.2.1 Public Health and Safety

Minnesota Power would implement proper safeguards during construction and operation to avoid potential impacts to public health and safety. Concerns related to health and safety include hazards associated with coming into contact with energized equipment, induction, and stray voltage. In general, impacts to public health and safety from the project are not anticipated.

6.2.1.1 Mitigative Measures

The Project would be designed in compliance with local, state, NESC, and Minnesota Power standards for clearance to ground, crossing utilities and buildings, strength of materials, and ROW widths. Minnesota Power would ensure that construction and contract crews comply with local, state, NESC, and Company standards for installation of facilities and standard construction practices. Minnesota

Power and industry safety procedures would also be followed after the proposed Project is installed. This would include clear signage during all construction activities.

The proposed HVTL would be equipped with protective devices (circuit breakers and relays located in the substation where the transmission lines terminate) to safeguard the public if an accident occurs, such as a structure or conductor falling to the ground. The protective equipment would de-energize the transmission line should such an event occur. Minnesota Power would post signage to warn the public about the risk of coming into contact with the energized equipment. With implementation of safeguards and protective measures, the proposed Project is not anticipated to result in adverse or significant impacts on public health and safety.

6.2.2 Residential and Non-Residential Land Use

The proposed Route would cross areas zoned as industrial, residential, and forest agricultural management. Construction of the proposed HVTL is primarily located in open wetland areas and wetlands adjacent to railroad tracks. A small portion of the proposed HVTL route (1.6 acres) crosses an area zoned residential. Table 8 summarizes the number of residences located within the proposed ROW and within 1,000 feet of the proposed Project.

Table 8 Residential and Non-residential Buildings within Various Distances of Proposed Route

Structure Type	Proposed Route	Number of Structures within Various Distances	
		Within ROW	Within 1,000 feet of Proposed Route
Residence	115 kV Route	0	0
Commercial Structure	115 kV Route	0	0

There are no residential or non-residential buildings within 1,000 feet of the proposed Route.

The proposed Project will not require displacement of occupied residences or commercial businesses. Minnesota Power will seek to construct the HVTL consistent with any applicable zoning ordinances. However, no zoning, building, or land use approvals will be required from surrounding municipalities if a Route Permit is issued for the proposed Project because once the Commission issues a Route Permit, zoning, building, and land use regulations and rules are preempted per Minn. Stat. § 216E.10, subd. 1. No adverse or significant impacts on residential or commercial structures as a result of the proposed Project are anticipated.

6.2.2.1 **Mitigative Measures**

As discussed in Section 4.2.2, as part of the planning process, the Applicant assessed the general area surrounding the proposed Project to identify significant routing issues that might arise and to evaluate environmental resources in the vicinity of the proposed Project. A team of siting, ROW, planning, environmental, ecological, and engineering personnel worked together to develop a proposed Route that minimize overall impacts of the proposed Project. Based on this work and the remote location, the proposed Project is able to avoid displacement of homes. The nearest structure to the Proposed Route is dwelling located approximately 1950 feet from the Proposed Route. If the alignment deviates from the proposed centerline due to unforeseen challenges, every effort will be made to maintain a 500-foot buffer from the dwelling cited above. Because no displacement would occur, no additional mitigative measures are proposed.

6.2.3 Noise

Transmission conductors produce noise under certain conditions. The level of noise depends on conductor conditions, voltage level, and weather conditions. Generally, activity-related noise levels during the operation and maintenance of transmission lines are minimal.

Noise emissions from a transmission line occur during certain weather conditions. In foggy, damp, or rainy weather, power lines can create a crackling sound when a small amount of electricity ionizes the moist air near the wires. During heavy rain, the background noise level of the rain is usually greater than the noise from the transmission line. As a result, people do not normally hear noise from a transmission line during heavy rain. During light rain, dense fog, snow, and other times when there is moisture in the air, transmission lines can produce noise. Noise levels produced by a 115 kV transmission line are generally less than outdoor background levels and are therefore not usually audible.

Since human hearing is not equally sensitive to all frequencies of sound, the most noticeable frequencies of sound are given more “weight” in most measurement schemes. The A-weighted scale corresponds to the sensitivity range for human hearing. Noise levels capable of being heard by humans are measured in decibels (dBA). A noise level change of 3 dBA is barely perceptible to human hearing. A 5 dBA change in noise level, however, is clearly noticeable. A 10 dBA change in noise level is perceived as a doubling of noise loudness, while a 20 dBA change is considered a dramatic change in loudness. Table 9 shows noise levels associated with common, everyday sources.

Table 9 Common Noise Sources and Levels

Noise Source*	Sound Pressure Level (dBA)
Jet Engine (at 25 meters)	140
Jet Aircraft (at 100 meters)	130
Rock Concert	120
Pneumatic Chipper	110
Jackhammer (at 1 meter)	100
Chainsaw. Lawn Mower (at 1 meter)	90
Heavy Truck Traffic	80
Business Office, Vacuum Cleaner	70
Conversational Speech, Typical TV Volume	60
Library	50
Bedroom	40
Secluded Woods	30
Whisper	20

Source: Minnesota Pollution Control Agency[5].

In Minnesota, statistical sound levels ("L" or Level Descriptors) are used to evaluate noise levels and identify noise impacts. The standards are expressed as a range of permissible dBA within a one hour period; L_{50} is the dBA that may be exceeded 50 percent of the time within an hour, while L_{10} may be exceeded 10 percent of the time within an hour.

Land areas, such as picnic areas, churches, or commercial spaces, are assigned to an activity category based on the type of activities or use occurring in the area. Activity categories are then categorized based on their sensitivity to traffic noise. The Noise Area Classification (NAC) is listed in the Minnesota Pollution Control Agency (MPCA) noise regulations to distinguish the categories. Residential areas, churches, and similar type land use activities are included in NAC 1; commercial-type land use activities are included in NAC 2; and industrial-type land use activities are included in NAC 3.

Table 10 identifies the established MPCA daytime and nighttime noise standards by NAC.

Table 10 Noise Standards by Noise Area Classification (dBA)

NAC	Daytime		Nighttime	
	L_{50}	L_{10}	L_{50}	L_{10}
1	60	65	50	55
2	65	70	65	70
3	75	80	75	80

The audible noise associated with the proposed transmission line was modeled using the Corona and Field Effects (CFE) spreadsheets developed by the Bonneville Power Administration. Table 11 presents the L_5 and L_{50} noise levels predicted for proposed transmission line structures and voltages for the proposed Project. The worst case indicated that the audible L_5 and L_{50} noise levels measured at the edge of the ROW (50 feet from centerline) are associated with the 115 kV line and would be 18.89 and 15.39 dBA, respectively, well below the MPCA limits for the relevant noise area classifications (NAC 1, NAC 2 and NAC 3) in the area crossed by the line.

Table 11 Calculated Audible Noise (dBA) for Proposed Transmission Line Designs

Structure Type	Noise L_5 (Edge of ROW) (Decibels a weighted)	Noise L_{50} (Edge of ROW) (Decibels a weighted)
115 kV H-Frame	18.89	15.39

The noise generated from the proposed HVTLs is not expected to exceed background noise levels and would, therefore, not be audible at any receptor location. The noise level is well below the MPCA limits for the relevant noise area classifications (NAC 1, NAC 2, and NAC 3). The proposed HVTLs would be designed and constructed to comply with state noise standards established by the MPCA. Any audible noise would be below the MPCA noise standards established for NAC 1. Additionally, it is not anticipated that the proposed Project would increase noise from transmission line conductors or any associated facilities above the levels already experienced in the area.

With implementation of state design and construction standards, the proposed Project is not anticipated to result in adverse or significant impacts on the public as a result of noise.

6.2.3.1 Mitigative Measures

As discussed in section 4.2.2, as part of the planning process, the Applicant assessed the general area surrounding the proposed Project to identify significant routing issues that might arise and to evaluate environmental resources in the vicinity of the proposed Project. A team of siting, ROW, planning, environmental, ecological, and engineering personnel worked together to develop proposed Routes that minimize overall impacts of the proposed Project. Based on this work the proposed Project has been designed to avoid proximity to homes and no additional mitigative measures are proposed.

6.2.4 Television and Radio Interference

Corona from transmission line conductors can generate electromagnetic “noise” at the same frequencies that radio and television signals are transmitted. This noise can cause interference with the reception of these signals depending on the frequency and strength of the radio and television signal. Tightening loose hardware on the transmission line usually resolves the problem.

If radio interference from transmission line corona does occur, satisfactory reception from AM radio stations previously providing good reception can be restored by appropriate modification of (or addition to) the receiving antenna system. AM radio frequency interference typically occurs immediately under a transmission line and dissipates rapidly within the ROW to either side.

FM radio receivers usually do not pick up interference from transmission lines because:

- corona-generated radio frequency noise currents decrease in magnitude with increasing frequency and are quite small in the FM broadcast band (88-108 Megahertz); and
- the excellent interference rejection properties inherent in FM radio systems make them virtually immune to amplitude type disturbances

A two-way mobile radio located immediately adjacent to and/or behind a large metallic structure (such as a steel tower) may experience interference because of signal-blocking effects. Movement of either mobile unit so that the metallic structure is not immediately between the two units should restore communications. This would generally require a movement of less than 50 feet by the mobile unit adjacent to a metallic tower.

Television interference is rare but may occur when a large transmission structure is aligned between the receiver and a weak distant signal, creating a shadow effect. Loose and/or damaged hardware may also cause television interference. If television or radio interference is caused by or from the operation of the proposed facilities in those areas where good reception is presently obtained, the Applicant would inspect and repair any loose or damaged hardware in the transmission line, or take other necessary action to restore reception to the present level, including the appropriate modification of receiving antenna systems if deemed necessary.

6.2.4.1 **Mitigative Measures**

The Applicant does not anticipate that the proposed Project would create interference with radio or television signals, however if radio or television interference occurs due to the proposed Project, the Applicant would work with the affected landowner to restore reception to pre-Project quality.

6.2.5 Aesthetics

Aesthetics refer to the natural and human modified landscape features or visual resources that contribute to the public's experience and appreciation of the environment. Wetlands, surface waters, landforms, forests, and vegetation patterns are among the natural landscape features that define an area's visual character. Buildings, roads, bridges, and other structures reflect human modifications to the landscape. The scenic value or visual importance of an area is a subjective matter and depends upon the perception and philosophical and/or psychological response of the viewer. Generally, landscapes that exhibit a high degree of variety and harmony among the basic elements of form, line, color, and texture have the greatest potential for high visual and aesthetic quality. The level of impact to visual

resources is also subjective and generally depends on the sensitivity and exposure of a particular viewer and can, therefore, vary greatly from one individual to the next.

The proposed Project area is zoned as industrial, residential, and forest agricultural management. The landowners include United Taconite, Canadian National Railroad, State of Minnesota, and one private landowner. There are no residential structures located within the proposed Project area. The closest dwelling to the proposed route is approximately 1950 feet away in a forested area. Therefore, the aesthetics of the property would not be adversely affected by the proposed Project.

Additionally, the existing segment of overhead electric line would be decommissioned and removed, resulting in no net gain or loss in visual encumbrance due to overhead power infrastructure.

6.2.5.1 Mitigative Measures

Because the HVTL would not have a significant impact on the overall landscape, mitigative measures are not anticipated to be necessary.

6.2.6 Socioeconomic

Population and economic characteristics based on the 2010 U.S. Census are provided in Table 12. As reported in the 2010 U.S. Census, the population density of St. Louis County is 32 people per square mile. Minorities and persons living in poverty make up 7.1 percent and 16.1 percent of the population, respectively. For comparison, minorities comprise 15.9 percent of the statewide population and 11 percent of Minnesota residents live in poverty[6].

Zim, Peary, and Forbes are the most proximate communities to the proposed Project. Census information is not available for these communities; therefore, Eveleth and Gilbert were looked at more closely. The minority population percentages in Eveleth and Gilbert are similar to the county as a whole. Per capita income in the cities is below the average for St. Louis County.

Table 12 Population and Economic Characteristics

Location	Population	Minority Population (percent)	Caucasian Population (percent)	Per Capita Income	Percentage of Population Below Poverty Level
Eveleth[7]	3,718	5*	95	16,635	15.4
Gilbert[8]	1,799	1.4*	98.6	16,514	13.2
St. Louis County[9]	200,226	7.1*	92.9	25,688	16.1

*Sum of Black persons, American Indian and Alaska Native persons, Asian persons, Native Hawaiian and Other Pacific Islander persons and Persons of Hispanic or Latino Origin percentages.

Approximately 24 to 30 workers would be required for transmission line construction.

There would be minor short-term impacts to community services as a result of construction activity and an influx of contractor employees during construction of the proposed Project. Utility personnel or

contractors would be used for all construction activities. The communities near the Project area may experience a minor short-term positive economic impact through the use of the hotels, restaurants, and other services by the various workers.

The HVTL Project would not create any permanent jobs; however, the construction activities will provide a seasonal influx of additional dollars into the communities during the construction phase, and materials such as concrete may be purchased from local vendors where feasible. Long-term beneficial impacts from the proposed transmission lines and substation expansion would be measured as the value of the United Taconite tailings basin expansion, which would allow United Taconite to continue operating.

6.2.6.1 Mitigative Measures

Socioeconomic impacts resulting from the proposed Project will be primarily positive with an influx of wages and expenditures made at local businesses during project construction, and the value of maintaining United Taconite's operation. No mitigative measures are proposed.

6.2.7 Cultural Values

Cultural values include those perceived community beliefs or attitudes that provide a framework for unity in a given community. The communities near the proposed Project appear to value outdoor recreation and the scenic nature of the north woods region. The communities in the Project area have cultural ties to German, Norwegian, Swedish, Finnish, English, Italian, and Native American heritages[8,9]. The proposed project is not expected to impact the framework or sense of unity of the community and would not alter features in the area that contribute significantly to the cultural nature of the region.

6.2.7.1 Mitigative Measures

No impacts are anticipated and, therefore, no mitigative measures are proposed.

6.2.8 Recreation

The Project area is located in a region that is known for its outdoor recreation opportunities. The region includes vast areas of forest, lakes, rivers, and streams, making it a destination for outdoor recreation. The area offers opportunities for walleye and northern pike fishing, kayaking, boating, cycling, hiking, hunting, cross country skiing, and snowmobiling.

The proposed Project is not located in the immediate vicinity of any recognized recreational area; however, Hiekkila and Murphy Lakes are located within one mile of the proposed Project as shown in Figure 2. Several properties have shoreline property on these water bodies. These property owners and the general public may use the lakes for a variety of recreational activities; including boating, fishing, and watersports. The proposed Project is not in the immediate vicinity of these lakes and, thus, no impacts are anticipated.

6.2.8.1 Mitigative Measures

No impacts to recreation activities are anticipated and, therefore, no mitigative measures are anticipated to be necessary.

6.2.9 Public Services

Public services and facilities in the proposed Project area generally include emergency services provided by government entities, including hospitals, fire departments, and police departments, water supply or wastewater disposal systems, and gas and electricity services, and existing and future transportation corridors and projects.

The nearest hospital is Essentia Health, located approximately 14 miles away in the City of Virginia. The HVTL does not cross any roadways and is therefore unlikely to have an impact on public services.

6.2.9.1 Public Services

No impacts to public services are anticipated and, therefore, no mitigative measures are proposed.

6.2.10 Utilities

Construction and operation of the proposed Project is not anticipated to impact any public service utilities.

6.2.11 Transportation and Traffic

Transportation infrastructure in the proposed Project area includes one railroad owned by Canadian National Railroad (C/N). Minnesota Power proposes to purchase ROW adjacent to C/N's ROW for the Project. Although a small portion of ROW could be shared (co-locating) between the two features, co-locating would increase cost and unpredictability to the project. If co-located, all construction and maintenance activities would require coordination, permitting and oversight by C/N. Combined with construction and maintenance restrictions, a yearly ROW fee would also be assessed. In addition, ROW agreements with all railroads can be cancelled at their discretion. As a result of these restrictions, co-locating with C/N would be expensive and operationally impractical.

The proposed HVTL would connect to Minnesota Power's existing 16 Line on the east side of United Taconite's existing tailings basin and proceed southeast parallel to C/N's existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line. Access during construction and maintenance is expected to be primarily from existing roads. The adjacent railroad and nearby roadways will not be impacted during the construction and maintenance of the proposed Project. Comments were requested regarding the proposed Project from both St. Louis County and the Minnesota Department of Transportation (MnDOT) (Appendix A). To date, no response has been received.

6.2.11.1 Mitigative Measures

No impacts to emergency services are anticipated, Minnesota Power would minimize potential impacts through coordination of the construction with local and state road authorities and use signage during construction to alert drivers. No significant conflicts are anticipated.

Operation of the transmission line is not expected to impact vehicular or rail traffic. Pole placement and construction procedures would be developed in consultation with state and county roadway authorities to meet requirements for clear zones and roadside obstructions if any negative impacts were foreseen. Planning for the proposed Project would also be coordinated with MnDOT and St. Louis County transportation policies to minimize impacts from construction of the proposed Project, if necessary.

6.3 Land Based Economics

6.3.1 Agriculture

Federal regulations define prime farmland as "land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is available for these uses." (7 C.F.R. 657.5(a)(1)) identifies the types and acreages of farmland within the proposed Routes and proposed Substation Location. The National Land Cover Dataset (2006) does not identify any croplands in the HVTL route.

Areas identified as prime farmland and as prime farmland if drained (soils that have the potential to be prime farmland but would require hydrologic alteration) do not occur within the HTVL route. See Figure B6. in Appendix B.

6.3.1.1 Mitigative Measures

Because there is no farmland within the project route, no mitigative measures are anticipated to be necessary.

6.3.2 Forestry

There are no known tree farms or federal or state forests located within the area of the proposed Route.

6.3.2.1 Mitigative Measures

No impacts to forestry resources are anticipated and, therefore, no mitigative measures are proposed.

6.3.3 Tourism

No formal tourist areas are present within the proposed Route. However, nearby lakes, rivers, parks, and forests provide a variety of outdoor recreational activities for tourists visiting the area.

6.3.3.1 Mitigative Measures

No impacts to tourism resources are anticipated and, therefore, no mitigative measures are proposed.

6.3.4 Mining

The proposed Project's objective is to accommodate a tailings basin addition proposed by United Taconite. Approximately 0.70 miles of the three-mile HVTL would be on United Taconite property. The proposed Project would have a positive impact on mining by enabling United Taconite's continued operation in the area currently occupied by the 16 Line that will be relocated as part of the project.

6.3.4.1 Mitigative Measures

The proposed Project is being closely coordinated with United Taconite to ensure the proposed Route does not interfere with their planned mining operations. The proposed Route has been reviewed and, based on the location of the expansion of the tailings pond, is agreeable to United Taconite.

6.4 Archaeological and Historic Resources

Archaeological and historic resources are those places that represent the visible or otherwise tangible record of human occupation. These resources vary in size, shape, condition, and importance, among other considerations; some are evident on the landscape, while others are buried or only visible to knowledgeable people.

Two Pines Resource Group, LLC (Two Pines) conducted a cultural resources literature search for the proposed Project in December of 2014. Based on the data from Two Pines, no archaeological or historic resources have been documented within one mile of the proposed Route. See Appendix F for their detailed report.

6.4.1.1 Mitigative Measures

The proposed Project will avoid impacts to identified archaeological and historic resources within the vicinity; therefore no mitigative measures are proposed.

6.5 Natural Environment

6.5.1 Air Quality

Potential air quality effects related to transmission facilities include fugitive dust emissions during construction, exhaust emissions from construction equipment, and ozone generation during transmission line operation. All of these potential effects are considered to be relatively minor, and all but the ozone effects are short-term.

State and federal governments currently regulate permissible concentrations of ozone and nitrogen oxides. Ozone forms in the atmosphere when nitrogen oxides and volatile organic compounds react in the presence of heat and sunlight. Air pollution from cars, trucks, power plants, and solvents contribute to the concentration of ground-level ozone through these reactions. The national standard is 0.075 parts per million (ppm) during an eight-hour averaging period. The state standard is 0.08 ppm based upon the fourth-highest eight-hour daily maximum average in one year.

The only potential air emissions from a transmission line result from corona, and such emissions are limited. Corona consists of the breakdown or ionization of air within a few centimeters immediately surrounding conductors and can produce ozone and oxides of nitrogen in the air surrounding the conductor. This process is limited because the conductor electrical gradient of a 115 kV transmission line is usually less than that necessary for the air to break down. Typically, some imperfection such as a scratch on the conductor or a water droplet is necessary to cause corona.

Ozone is not only produced by corona, but also forms naturally in the lower atmosphere from lightning discharges and from reactions between solar ultraviolet radiation and air pollutants such as hydrocarbons from auto emissions. The natural production rate of ozone is directly proportional to temperature and sunlight and inversely proportional to humidity. Thus humidity (or moisture), the same factor that increases corona discharges from transmission lines, inhibits the production of ozone. Ozone is a reactive form of oxygen and combines readily with other elements and compounds in the atmosphere. Because of its reactivity, it is relatively short-lived. There are currently no non-attainment areas listed for St. Louis County[10].

During construction of the proposed HVTL, minor emissions from vehicles and other construction equipment and fugitive dust from right-of-way clearing would occur, but would be limited. Air-quality impacts during the construction phase would also be temporary. The magnitude of construction emissions is heavily influenced by weather conditions and the specific construction activity. Exhaust emissions, primarily from diesel equipment, would vary according to the phase of construction, but would be minimal and temporary. Adverse impacts on the surrounding environment would be minimal because of the short and intermittent nature of the emission and dust-producing construction phases.

The proposed Project is not anticipated to result in adverse or significant effects on air quality.

6.5.1.1 **Mitigative Measures**

The Applicant would employ BMPs to minimize the amount of fugitive dust created by the construction process. Tracking control at access roads and wetting surfaces are examples of BMPs that would be used to minimize fugitive dust. Based upon this, the Applicant anticipates nominal impacts to air quality. Therefore, no other mitigative measures are proposed.

6.5.2 Water Resources

6.5.2.1 **Water Quality**

The proposed Project may have minor, short term effects on water quality. Impacts on water quality are possible during the construction phase of the proposed Project; when sediment could possibly reach surface waters due to excavation, grading, and construction traffic disturb the ground.

6.5.2.2 **Mitigative Measures**

The MPCA regulates construction activities that may impact storm water under the Clean Water Act. In the event that a National Pollutant Discharge Elimination System (NPDES) construction storm water permit and Stormwater Pollution Prevention Plan (SWPPP) is required for the proposed Project, the Applicant would obtain the permit and prepare a SWPPP. An NPDES permit is required for owners or operators for any construction activity disturbing: 1) one acre or more of soil; 2) less than one acre of soil if that activity is part of a "larger common plan of development or sale" that is greater than one acre; or 3) less than one acre of soil, but the MPCA determines that the activity poses a risk to water resources. The SWPPP would outline strategies and steps that would be taken to prevent nonpoint source pollution discharging from construction areas. Examples of temporary erosion prevention BMPs that may be used during the proposed Project are listed below:

- Mulch or erosion control blankets may be utilized to stabilize upland areas of exposed soil.
- Tarps, plastic sheeting, or other appropriate cover may be utilized to stabilize stockpiles.
- Silt fence or sediment control logs may be utilized along slopes and around stockpiles to minimize sediment runoff.
- Discharges from BMPs may be directed to vegetated areas of the site (including any natural buffers) in order to increase sediment removal and maximize stormwater infiltration.
- Vehicle tracking BMPs (such as a rock pads, mud mats, slash mulch, or equivalent) may be installed to minimize the track out of sediment from the construction areas.

6.5.2.3 **MnDNR Public Waters Inventory**

The MnDNR Public Waters Inventory (PWI) identifies basins (lakes and wetlands) and watercourses over which the MnDNR has regulatory jurisdiction. The statutory definition of public water is found in Minn. Stat. § 103G.005, subd. 15 and 15a. There are no PWI basins within the proposed ROW. See Figure B.2.

6.5.2.4 **Mitigative Measures**

Because there are no PWI basins within the proposed ROW, no mitigative measures are anticipated to be necessary.

6.5.2.5 **Wetlands**

Wetland locations within the vicinity of the proposed Project area were initially identified using the U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) maps. Wetlands based on this data are summarized in Table 13 and shown on Figure B.2.

Based on NWI data approximately 157.5 acres of Forested/Shrub Wetland have been mapped within the proposed 115 kV HVTL route; this represents approximately 94 percent of the route. Approximately 33.3

acres of Forested/Shrub Wetland have been mapped within the proposed 115 kV HVTL ROW; this represents approximately 95 percent of the ROW. The proposed alignment of the 115 kV HVTL would require wetland crossings ranging in length from 250 feet to 1.7 miles. Because the maximum span length for this HVTL is 650 feet (+/- 150 feet for H-frame structures; Table 5), it is not possible to span the wetland crossings. Due to the concentration of wetlands in the proposed Project area it is anticipated that all (current estimate 24) poles will be placed within wetlands; however, if during construction it is possible to place poles in areas identified as uplands this will be the preferred method.

Table 13 Acres of Wetland within Routes/ROW

NWI Wetland Type	Wetland (acres)	
	ROW	Route
Forested/Shrub	33.3	157.5
Total acres	**33.3**	**157.5**

6.5.2.6 Mitigative Measures

It is anticipated that all HVTL structures associated with the proposed Project would need to be placed within wetlands; any necessary permits would be obtained after design is completed. Construction crews will use several methods to minimize wetland impacts:

- when possible, construction would be scheduled to occur when the ground is frozen;
- crews would attempt to take the shortest route when they access the wetland;
- the structures would be assembled on upland areas before they are brought to the site for installation where practicable; and
- when construction during winter is not possible, construction mats would be used where wetlands would be affected.

The Applicant would design the proposed Project to avoid and minimize wetland impacts, and would apply erosion control measures identified in the Minnesota Pollution Control Agency (MPCA) Storm Water BMPs Manual, such as using silt fencing to minimize impacts to water quality. Timely approval of the Route Permit will facilitate construction in the winter of 2015/2016 to enable minimization of wetland impacts.

As previously stated in 6.5.2.2, the MPCA regulates construction activities that may impact storm water under the Clean Water Act. In the event that a National Pollutant Discharge Elimination System (NPDES) construction storm water permit and Stormwater Pollution Prevention Plan (SWPPP) are required for the proposed Project, the Applicant would obtain the permit and prepare a SWPPP. An NPDES permit is required for owners or operators for any construction activity disturbing: 1) one acre or more of soil; 2) less than one acre of soil if that activity is part of a "larger common plan of development or sale" that is

greater than one acre; or 3) less than one acre of soil, but the MPCA determines that the activity poses a risk to water resources. The SWPPP would outline strategies and steps that would be taken to prevent nonpoint source pollution discharging from construction areas.

6.5.2.7 **Floodplain**

There are no floodplains in the proposed Project area[11]. See Figure B.5 in Appendix B.

6.5.2.8 **Mitigative Measures**

No impacts to floodplain resources are anticipated; therefore, no mitigative measures are proposed.

6.5.3 Flora

The MnDNR Gap Analysis Program (GAP) Land Cover data set[12] was used to identify land cover types in the vicinity of the Project area. This data is shown in Figure B-3. Land cover is summarized in Table 14.

Table 14 Land Use/Land Cover within the 100 ft ROW

Land Cover Type	Acres	Percent
Aquatic	0.75	2.15
Lowland Shrub	11.02	31.58
Marsh	1.86	5.32
Tamarack	4.89	13.99
Lowland Black Spruce	15.00	42.96
Aspen/White Birch	0.55	1.57
Pine	0.60	1.72
Grassland	0.25	0.71
Total	**34.91**	**100**

6.5.3.1 **Mitigative Measures**

Impacts to non-forested areas would be temporary and would primarily occur during construction of the proposed Project. To minimize impacts to trees in the Project area, the Applicants would limit tree clearing and removal to the transmission line ROW, areas that limit construction access to the Project area, and areas that impact the safe operation of the facilities. Trees outside the ROW that may need to be trimmed or removed would primarily include trees that are unstable and could potentially fall into the transmission facilities. The Applicant would work with and compensate landowners for removal of trees not in the ROW.

Construction equipment has the potential to spread noxious weed-propagating material to new locations. The Applicant would comply with Minnesota noxious weed laws as described in Minn. Stat. § 18.75 to 18.91 and avoid the transport of state prohibited noxious weeds as well as secondary noxious weeds on the Itasca County weed list. All areas disturbed by construction of the transmission lines would be reseeded using a native seed mix appropriate to the site.

6.5.4 Fauna

The Anchor Lake MnDNR Wildlife Management Area (WMA)[13] is located approximately 0.75 miles east of the Project location; however, this area will not be impacted for the proposed Project. No USFWS Waterfowl Production Areas (WPA)[14] are located within the vicinity of the proposed Route. The proposed Project crosses a variety of habitat for fauna that are commonly found in Northeast Minnesota. These species may include deer, small mammals, waterfowl, raptors, perching birds, amphibians, and others.

The primary potential impact presented to fauna by transmission lines is the potential injury and death of migratory birds such as raptors, waterfowl, and other large bird species. The electrocution of large birds, such as raptors, is more commonly associated with small distribution lines than large transmission lines. However, birds have the potential to collide with all elevated structures, including transmission lines. Avian collisions with transmission lines can occur in proximity to wooded areas, wetlands and water features, and along riparian corridors that may be used during migration.

Forest fragmentation is a form of habitat fragmentation, and occurs when forests are cut down and leave relatively small, isolated patches of forest known as forest fragments or forest remnants. Forest fragmentation and the subsequent habitat fragmentation can decrease biodiversity and could result in:

- the inability of individual forest fragments to support viable populations, especially of large vertebrates
- the local extinction of species that do not have at least one fragment capable of supporting a viable population
- edge effects that alter the conditions of the outer areas of the fragment, greatly reducing the amount of true forest interior habitat

The effect of fragmentation on the flora and fauna depends on a) the size of the remaining forest, and b) its degree of isolation. Isolation depends on the distance to the nearest similar patch of forest, and the contrast with the surrounding areas. For example, if a cleared area is reforested or allowed to regenerate, the increasing structural diversity of the vegetation will lessen the isolation of the forest fragments.

In the case of the proposed project, the entire ROW would be cleared during construction. Post-construction, the majority of the Project ROW would be allowed to naturally re-vegetate, however, large trees that could threaten the transmission line would be periodically trimmed or removed. The project will result in minor, temporary forest fragmentation during construction but the effects would not be significant as the area does not include contiguous forest areas.

6.5.4.1 **Mitigative Measures**

Displacement of fauna is anticipated to be minor and temporary in nature, and no long-term population-level impacts are anticipated from the proposed Project. The Applicant would construct the transmission line according to Avian Power Line Interaction Committee (APLIC) recommended safety design standards regarding avian collisions and avian electrocution with HVTLs[14][15]. In addition, the Applicant would work with the MnDNR and the USFWS to identify any areas that may require marking transmission line shield wires and/or using alternative structures to reduce the likelihood of avian collisions.

6.6 Rare and Unique Natural Resources

The USFWS list of federally threatened, endangered, proposed, and candidate species was reviewed[15][16] to obtain information on federally-listed species that could be present in the Project area. According to the USFWS list, St. Louis County, where the proposed Project is located, is within the overall range of the Canada Lynx (*Lynx canadensis*; federally threatened), Grey Wolf (*Canis lupus*; federally threatened) and the piping plover (*Charadrius melodus*; federally endangered). If Canada Lynx or Grey Wolf are present it is unlikely the proposed Project would adversely affect them as it would not limit their movement and would not have direct impacts on active denning sites. Piping plover, which occupies shoreline and open sandy habitats, would not be present in the project area. In addition to the three listed species, two Proposed species, the rufa red knot (*Calidris canutus rufa*) and the northern long-eared bat (*Myotis septentrionalis*), are currently being considered for listing in St. Louis County. No rufa red knot are expected to be found in the project vicinity, as the species only utilizes shoreline areas during migration through this county. The northern long-eared bat is anticipated to be listed as threatened or endangered in April 2015. All impacts to the species will be avoided by adhering to seasonal tree-clearing restrictions. All impacts to the species will be avoided by adhering to seasonal tree-clearing restrictions. Trees will not be cleared from April 1st through September 30th.

The Minnesota Natural Heritage Inventory System (NHIS) database was reviewed for state-listed threatened, endangered, and special concern species that have been documented within one mile of the proposed Project. There are records of five northern goshawk (*Accipiter gentilis*; state special concern) nests comprising one territory as well as one bald eagle (*Haliaeetus leucocephalus*) nest within one mile of the project as shown in Figure B.4.

6.6.1.1 **Mitigative Measures**

The proposed Project is scheduled to take place outside of the active season of the northern long-eared bat; however, if the schedule is modified and work is planned to take place during the active season the Applicant would coordinate with the USFWS to avoid impacts or to obtain a permit for unavoidable impacts. If additional nesting birds including the northern goshawk and bald eagle are located within, or in close proximity to, the project area, the Applicant would coordinate with the appropriate agencies to determine the most applicable avoidance and minimization measures. Potential avoidance measures for

all potentially present species include seasonal restrictions to avoid disruption during the breeding season.

7.0 Agency Involvement, Public Participation and Required Permits and Approvals

7.1 Project Notices to Agencies, Local Government Units, and Interested Parties

All scoping materials can be found in Appendix D. On November 17, 2014, Minnesota Power sent letters to the Local Governmental Unit (LGU) within the Project area to provide the LGU notice of the proposed Project, requesting comments and concerns, and allowing the LGU the opportunity to request a meeting to discuss the proposed Project. This LGU letter is included in Appendix D.

On November 21, 2014, Minnesota Power sent notice letters describing the proposed Project, requesting comments, and announcing a public informational meeting on December 10, 2014 to pertinent federal and state agencies, local government units, and nearby landowners. At the time of this application three comments have been received. One comment was submitted by the U.S. Army Corps of Engineers ACOE representative via a letter dated December 8, 2014. One comment was submitted via email on December 17, 2014 by the MPCA. Each of these comments detail potential permits required from the agencies to complete the work each permits mentioned are outlined in Table 15, Potential Permits Required. As indicated in further detail in Section 7.5 all required permits (federal, state, and local) will be obtained prior to commencement of the proposed Project. A USDA representative submitted a comment via a letter dated December 18, 2014. The comment indicates the proposed Project will not impact USDA easement lands. Additionally, one comment was received from SHPO via letter dated December 18, 2014. The letter recommends a Phase I archeology survey be completed for the proposed Project. This survey was completed and is detailed in Section 6.4. The four comments received are included in Appendix D.

A notice for the public informational meeting was published in Virginia's Hometown Focus newspaper on December 5, 2014, 2014, See Appendix D.

The public informational meeting was held on December 10, 2014 from 6:30 to 7:30 p.m. at the Fayal Township Community Center in Eveleth to inform landowners and public officials of the proposed Project and to gather input to be used in further assessing Project impacts. Five people attended the meeting. A copy of the notice letter, newspaper notice, and open house attendee list is included in Appendix E.

7.2 United States Fish and Wildlife Service

On November 21, 2014, Minnesota Power sent a letter to the USFWS notifying them of the proposed Project. Additional detailed correspondence was submitted to USFWS on December 17, 2014 via email by Barr on behalf of Minnesota Power requesting a review of the Proposed Project. At the time of this application, no comments from the USFWS have been received.

7.3 Minnesota Department of Natural Resources

On November 21, 2014, Minnesota Power sent a letter to MnDNR notifying them of the proposed Project. Additional detailed correspondence was submitted to MnDNR on December 17, 2014 via email by Barr on behalf of Minnesota Power requesting a review of the Proposed Project. At present no comments have been received.

7.4 Minnesota State Historic Preservation Office

The Applicant is consulting with the Minnesota State Historic Preservation Office (SHPO) and will comply with Section 106 for the project. See Section 6.4.

7.5 Identification of Landowners

A list of landowners is included in Appendix C. Addresses have been redacted from the landowner list and comment forms due to privacy concerns.

In addition to a Route Permit, other Federal, State, and local permits could potentially be required for the proposed Project. These are identified below in Table 15.

Table 15 Potential Permits Required

Permit	Jurisdiction
Federal	
Section 404 Jurisdictional Determination/Permit	ACOE
State	
Route Permit	Commission
Utility Permit	MnDOT
NPDES Construction Stormwater Permit	MPCA
Section 401 Water Quality Certification	MPCA (required if the ACOE requires an individual permit for wetland dredging and filling activities, this certification is required)
Local	
Minnesota Wetland Conservation Act Certification	St. Louis County

For the other permits listed in Table 15 and any additional permit requirements identified during subsequent agency consultations, the Applicant will acquire the necessary authorizations and develop the appropriate plans associated with any permit or authorization (e.g., stormwater pollution prevention management plan prior to construction).

7.5.1 Federal Permits

7.5.1.1 U.S. Army Corps of Engineers

The ACOE regulates the placement of fill material into wetlands that are located adjacent to, or hydraulically connected to, interstate or navigable waters under the authority of Section 404 of the Clean Water Act. After coordination and application submission, authorization from the ACOE would likely fall under the utility line discharge provision of a Regional General Permit (RGP-3-MN) which provides for utility line discharges. Notification would be required because the proposed Project would cross more than 500 feet of wetland and require direct fill for placement of structures in wetlands.

7.5.2 State of Minnesota Permits

7.5.2.1 Minnesota Public Utilities Commission

Minn. Stat. § 216E.03, subd. 2, provides that no person may construct a HVTL without a Route Permit from the Commission. The Applicant is seeking a Route Permit from the Commission with this Application.

7.5.2.2 Minnesota Department of Natural Resources

The MnDNR Division of Lands and Minerals regulates utility crossings on, over or under any state land or public water identified on the Public Waters and Wetlands Maps. A license to cross Public Waters is required under Minn. Stat. § 84.415 and Minn. R., chapter 6135. The MnDNR Division of Waters requires a Public Waters Work Permit for any alteration of the course, current, or cross-section below the ordinary high water level of a Public Water or Watercourse. No such alterations are anticipated for the proposed Project.

7.5.2.3 Minnesota Pollution Control Agency

MPCA requires an NPDES construction storm water permit and SWPPP for owners or operators for any construction activity disturbing: 1) one acre or more of soil; 2) less than one acre of soil if that activity is part of a "larger common plan of development or sale" that is greater than one acre. The MPCA may also require the proposed Project to have an individual NPDES/SDS construction storm water permit. Most construction activities are covered by the general NPDES storm water permit for construction activity. Individual NPDES/SDS permits may be required for very large projects or projects that have a high potential to impact environmentally sensitive areas. The Applicant would determine if their project exceeds the one acre threshold, and, if so, obtain the permit or notice of permit coverage from the MPCA. The MPCA would notify the Applicant if they would need to obtain an individual NPDES/SDS permit for their project.

7.5.3 Local Permits

Once the Commission issues a Route Permit, zoning, building and land use regulations and rules are preempted per Minn. Stat. § 216E.10, subd. 1. Applicable permits from Itasca County concerning road

access, road ROW, and wetlands under Minnesota Wetland Conservation Act (WCA) will be secured as needed for the proposed Project.

8.0 References

[1] Minnesota Department of Health, "EMF White Paper on Electric and Magnetic Field (EMF) Policy and Mitigation Options," 2002.

[2] Natural Resource Council, "Possible Health Effects of Exposure to Residential Electric and Magnetic Fields," 1997.

[3] NIEHS. [Online]. Available: www.niehs.nih.gov/health/topics/agents/emf/.

[4] Minnesota Department of Natural Resources, "Minnesota Department of Natural Resources Ecological Classification System," January 2013. [Online]. Available: http://www.dnr.state.mn.us/ecs/index.html. [Accessed September 2013].

[5] Minnesota Pollution Control Agency, "A Guide to Noise Control in Minnesota," 2008. [Online]. Available: http://www.pca.state.mn.us/index.php/view-document.html?gid=5355.

[6] United States Census, 2000. [Online]. Available: http://quickfacts.census.gov/qfd/states/27/27137.html. [Accessed December 2014].

[7] Wikipedia, "Eveleth, Minnesota," 2014. [Online]. Available: http://en.wikipedia.org/wiki/Zim,_Minnesota. [Accessed December 2014].

[8] Wikipedia, "Gilbert, Minnesota," 2014. [Online]. Available: http://en.wikipedia.org/wiki/Gilbert,_Minnesota. [Accessed December 2014].

[9] Wikipedia, “St. Louis County, Minnesota,” 2014. [Online]. Available: http://en.wikipedia.org/wiki/St._Louis_County,_Minnesota. [Accessed December 2014].

[10] U.S. Environmental Protection Agency, "Current Nonattainment Counties for All Criteria Pollutants," July, 2014. [Online]. Available: http://www.epa.gov/oaqps001/greenbk/ancl.html

[11] Federal Emergency Management Agency, Flood Insurance Map, *Community Panel Number: 270416 1075C* Effective Date February 19, 1992.

[12] Minnesota Department of Natural Resources, *GAP Land Cover. GIS shapefile,* 2002.

[13] Minnesota Department of Natural Resources, Wildlife Management Areas http://www.dnr.state.mn.us/wmas/index.html. [Accessed September 2013]

[14] US Fish and Wildlife Service, Waterfowl Production Area Mapper http://gis.fws.gov/WPA_Mapper/. [Accessed September 2013]

[15] Avian Power Line Interaction Committee, *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006,* Washington, D.C. and Sacramento, CA: Edison Electric Institute, APLIC, and the California Energy Commission, 2006.

[16] United States Fish and Wildlife Service, "County Distribution of Minnesota’s Federally Threatened, Endangered, and Candidate Species," 2013. [Online]. Available: http://www.fws.gov/midwest/endangered/lists/minnesot-cty.html. [Accessed January 2013].

9.0 Definitions

Following are a list of definitions used in this Application:

Avian	Of or relating to birds.
A-weighted Scale	The sensitivity range for human hearing.
Breaker	Device for opening a circuit.
Conductor	A material or object that permits an electric current to flow easily.
Corona	The breakdown or ionization of air in a few centimeters or less immediately surrounding conductors.
Electric Field (EF)	The field of force that is produced as a result of a voltage charge on a conductor or antenna.
Electromagnetic	The term describing the relationship between electricity and magnetism; a quality that combines both magnetic and electric properties.
Electromagnetic Fields (EMF)	The term EMF refers to electric and magnetic fields that are coupled together, such as in high frequency radiating fields. For the lower frequencies associated with power lines, EMF should be separated into electric and magnetic fields. Electric and magnetic fields arise from the flow of electricity and the voltage of a line. The intensity of the electric field is related to the voltage of the line. The intensity of the magnetic field is related to the current flow through the conductors.
Excavation	A cavity formed by cutting, digging, or scooping.
Fauna	The collective animals of any place or time that live in mutual association.
Flora	The collective plants of any place or time that live in mutual association.

Grading	To level off to a smooth horizontal or sloping surface.
Grounding	To connect electrically with a ground.
Habitat	The place or environment where a plant or animal naturally or normally lives and grows.
High Voltage Transmission Lines (HVTL)	Overhead and underground conducting lines of either copper or aluminum used to transmit electric power over relatively long distances, usually from a central generating station to main substations. They are also used for electric power transmission from one central station to another for load sharing. High voltage transmission lines typically have a voltage of 69 kV or more.
Hydrocarbons	Compounds that contain carbon and hydrogen, found in fossil fuels.
Ionization	Removal of an electron from an atom or molecule. The process of producing ions. The electrically charged particles produced by high-energy radiation, such as light or ultraviolet rays, or by the collision of particles during thermal agitation.
Magnetic Field (MF)	The region in which the magnetic forces created by a permanent magnet or by a current-carrying conductor or coil can be detected. The field that is produced when current flows through a conductor or antenna.
Mitigate	To lessen the severity of or alleviate the effects of.
Neutral to Earth Voltage (NEV)	The term NEV is used to describe a measurable level of voltage which may occur between a metal object and the adjacent floor or earth.
Oxide	A compound of oxygen with one other more positive element or radical.
Ozone	A form of oxygen in which the molecule is made of three atoms instead of the usual two.

Raptor	A member of the order Falconiformes, which contains the diurnal birds of prey, such as the hawks, harriers, eagles and falcons.
Sediment	Material deposited by water, wind, or glaciers.
Stray Voltage	"Stray voltage" is a condition that can occur on the electric service entrances to structures from distribution lines, not transmission lines. More precisely, stray voltage is a voltage that exists between the neutral wire of the service entrance and grounded objects in buildings such as barns and milking parlors. Transmission lines do not, by themselves, create stray voltage because they do not connect to businesses or residences. Transmission lines, however, can induce stray voltage on a distribution circuit that is parallel to and immediately under the transmission line.
Ultraviolet Radiation	A portion of the electromagnetic spectrum with wavelengths shorter than visible light.
Voltage	Electric potential or potential difference expressed in volts.
Waterfowl	A bird that frequents water; especially a swimming game bird (as a duck or goose) as distinguished from an upland game bird or shorebird.
Waterfowl Production Area (WPA)	Waterfowl Production Areas preserve wetlands and grasslands critical to waterfowl and other wildlife. These public lands, managed by the U.S. Fish and Wildlife Service, were included in the National Wildlife Refuge System in 1966 through the National Wildlife Refuge Administration Act.
Wetland	Wetlands are areas that are periodically or permanently inundated by surface or ground water and support vegetation adapted for life in saturated soil. Wetlands include swamps, marshes, bogs and similar areas.

Wildlife Management Area (WMA)	Wildlife Management Areas are part of Minnesota's outdoor recreation system and are established to protect those lands and waters that have a high potential for wildlife production, public hunting, trapping, fishing and other compatible recreational uses.

10.0 Acronyms

AC	Alternating Current
ACOE	U.S. Army Corps of Engineers
ALJ	Administrative Law Judge
APLIC	Avian Power Line Interaction Committee
Applicant	Minnesota Power
Application	Route Permit Application
Barr	Barr Engineering Company
BMP	Best Management Practice
Brookings Project	Brookings County – Hampton 345 kV Route Permit proceeding
CEF	Considered Eligible For (listing in the National Register)
CFE	Corona and Field Effects
Commission	Minnesota Public Utilities Commission
Company	Minnesota Power, a division of ALLETE, Inc
dBA	A-weighted sound level in decibels
ECS	Ecological Classification System
EF	Electric Field
ELF	Extremely Low Frequency
EMF	Electric and Magnetic Fields
EQB	Environmental Quality Board
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
GAP	Gap Analysis Program
GIS	Geographic Information System
HVTL	High Voltage Transmission Line
kV	Kilovolt
kV/m	Kilovolts Per Meter
L	Level Descriptors or Statistical Sound Levels
L_{10}	the dBA that may be exceeded 10 percent of the time within an hour
L_{50}	the dBA that may be exceeded 50 percent of the time within an hour
LGU	Local Government Unit
MF	Magnetic Field
mG	milliGauss
MISO	Midcontinent Independent System Operator
MnDNR	Minnesota Department of Natural Resources
MnDOT	Minnesota Department of Transportation
MPCA	Minnesota Pollution Control Agency
NAC	Noise Area Classification
NESC	National Electric Safety Code
NEV	Neutral to Earth Voltage
NHIS	Natural Heritage Inventory System
NIEHS	National Institute of Environmental Health Sciences
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
ppm	parts per million
PPSA	Power Plant Siting Act

Project	Minnesota Power 16 Line Re-Route
PWI	MnDNR Public Water Inventory
RGP	Regional General Permit
ROW	Right-of-Way
SHPO	Minnesota State Historic Preservation Office
SWPPP	Stormwater Pollution Prevention Plan
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VOR	Very-High-Frequency Omni-Directional Range
WCA	Wetland Conservation Act
WMA	Wildlife Management Area
Working Group	Interagency Working Group
WPA	Waterfowl Production Area

Appendix A

Applicant's Notice Letter to Commission of Intent to Use Alternative Permitting Process

30 west superior street / duluth, minnesota 55802-2093 / fax: 218-723-3955 /www.allete.com

David R. Moeller
Senior Attorney
218-723-3963
dmoeller@allete.com

November 17, 2014

VIA ELECTRONIC FILING
Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

RE: 16 Line Reroute Project- St. Louis County, Minnesota
Minnesota Power's Notification of Intent to File Route Permit Application Under the Alternative Permitting Process
Docket No: E015/TL-14-_____

Dear Dr. Haar:

In accordance with Minn. Rules 7850.2800, subp. 2, Minnesota Power hereby notifies the Minnesota Public Utilities Commission (MPUC) of its intent to submit an application for a route permit for the 16 Line Reroute Project (Project) pursuant to the alternative permitting procedures in Minn. Rules 7850.2800 to 7850.3900.

The proposed project is the reroute of an approximately 3.0-mile-long portion of existing 115 kilovolt (kV) high voltage transmission line. The Project is needed to accommodate a tailings basin addition that United Taconite will begin building in 2016.

Minnesota Power plans to file the application by January 15, 2014 and will work with the MPUC and Department of Commerce staff to address any questions or comments to expedite the application's acceptance and completion of the environmental assessment.

If you have any questions or concerns please contact myself or Dan McCourtney at (218) 355-3515 or by email at dmcourtney@allete.com.

Yours truly,

David R. Moeller

DRM:sr
Attachment Aerial based map of project area.
cc: Dan McCourtney

Minnesota Power Proposed 16 Line Reroute

11/17/14

Legend

- Proposed16 Line Reroute
- Existing 16 Line
- Sections

N
W E
S

0.55 Miles

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STATE OF MINNESOTA	)	AFFIDAVIT OF SERVICE VIA
	) ss	ELECTRONIC FILING AND
COUNTY OF ST. LOUIS	)	U.S. MAIL

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 17th day of November, 2014, she served Minnesota Power's Notice to Intent to File Route Permit Application on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The remaining parties on the attached service list were served as so indicated on the list.

Susan Romans

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Thomas	Scharff	thomas.scharff@newpagecorp.com	New Page Corporation	P.O. Box 8050 610 High Street Wisconsin Rapids, WI 544958050	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Ron	Spangler, Jr.	rlspangler@otpco.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Karen	Turnboom	karen.turnboom@newpagecorp.com	NewPage Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List

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Document Upload Confirmation

Submission Information

Submission Number: 201411-104709
Submission Date/Time: 11/17/2014 03:48 PM

Filer Information

Filer: Moeller, David
Company: Minnesota Power
Email: dmoeller@allete.com
Phone Number: 218-723-3963

Document Information

Document Date: 11/17/2014
Document Type: Initial Filing
On Behalf Of: Minnesota Power

Service List Information

Docket #	List Name
Not Specified	Minnesota Power General Service List

Uploaded Documents Information

Selected Document	Classification	Additional Information
MPs Notice of Intent.pdf	Public	Minnesota Powers Notice of Intent to File Route Permit

Electronic Service

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Anderson	Julia	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Anderson	Christopher	canderson@allete.com	Minnesota Power	Electronic Service	Yes
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	Yes
Goodpaster	Elizabeth	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Electronic Service	No
Haar	Burl W.	burl.haar@state.mn.us	Public Utilities Commission	Electronic Service	No
Hodnik	Margaret	mhodnik@mnpower.com	Minnesota Power	Electronic Service	No
Hoyum	Lori	lhoyum@mnpower.com	Minnesota Power	Electronic Service	No
Krikava	Michael	mkrikava@briggs.com	Briggs And Morgan, P.A.	Electronic Service	No
Larson	James D.	james.larson@avantenergy.com	Avant Energy Services	Electronic Service	No
Larson	Douglas	dlarson@dakotaelectric.com	Dakota Electric Association	Electronic Service	No
Lindell	John	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Ludwig	Susan	sludwig@mnpower.com	Minnesota Power	Electronic Service	No
Marshall	Pam	pam@energycents.org	Energy CENTS Coalition	Electronic Service	No
Minke	Herbert	hminke@allete.com	Minnesota Power	Electronic Service	No

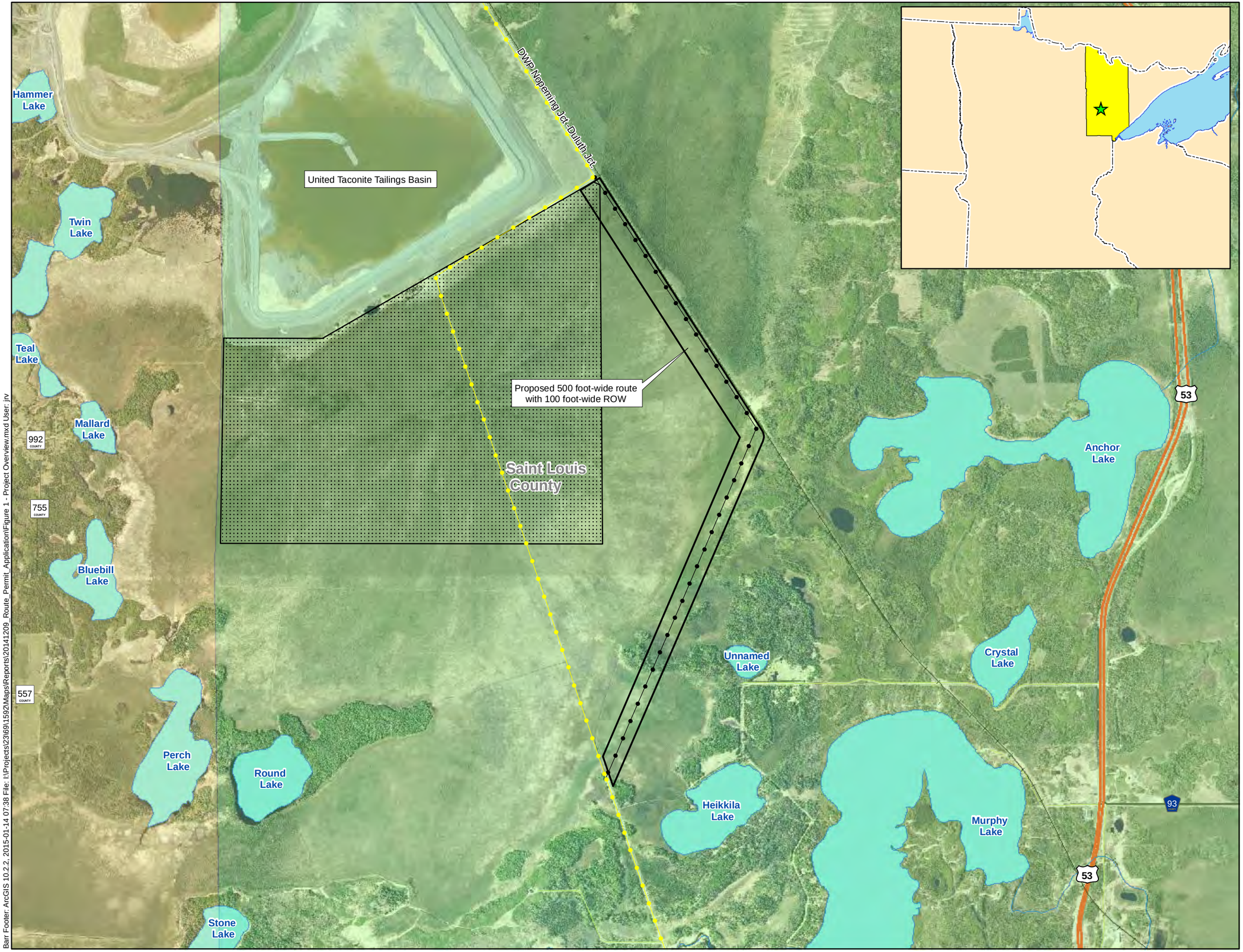
Moeller	David	dmoeller@allete.com	Minnesota Power	Electronic Service	Yes
Moratzka	Andrew	apmoratzka@stoel.com	Stoel Rives LLP	Electronic Service	No
Peterson	Jennifer	jjpeterson@mnpower.com	Minnesota Power	Electronic Service	No
Scharff	Thomas	thomas.scharff@newpagecorp.com	New Page Corporation	Electronic Service	No
Spangler, Jr.	Ron	rlspangler@otpco.com	Otter Tail Power Company	Electronic Service	No
Swanson	Eric	eswanson@winthrop.com	Winthrop Weinstine	Electronic Service	No
Turnboom	Karen	karen.turnboom@newpagecorp.com	NewPage Corporation	Electronic Service	No

CSV | Excel | PDF

Print Close

Appendix B

Environmental Feature and Resource Maps



Existing 16 Line

Proposed 16 Line Alignment

Proposed 16 Line 500 foot-wide Route

PWI Basin

PWI Watercourse

Tailings Basin Expansion Area

Township Boundary

Heikkila Lake Township

McDavitt Township

minnesota power

AN ALLETE COMPANY

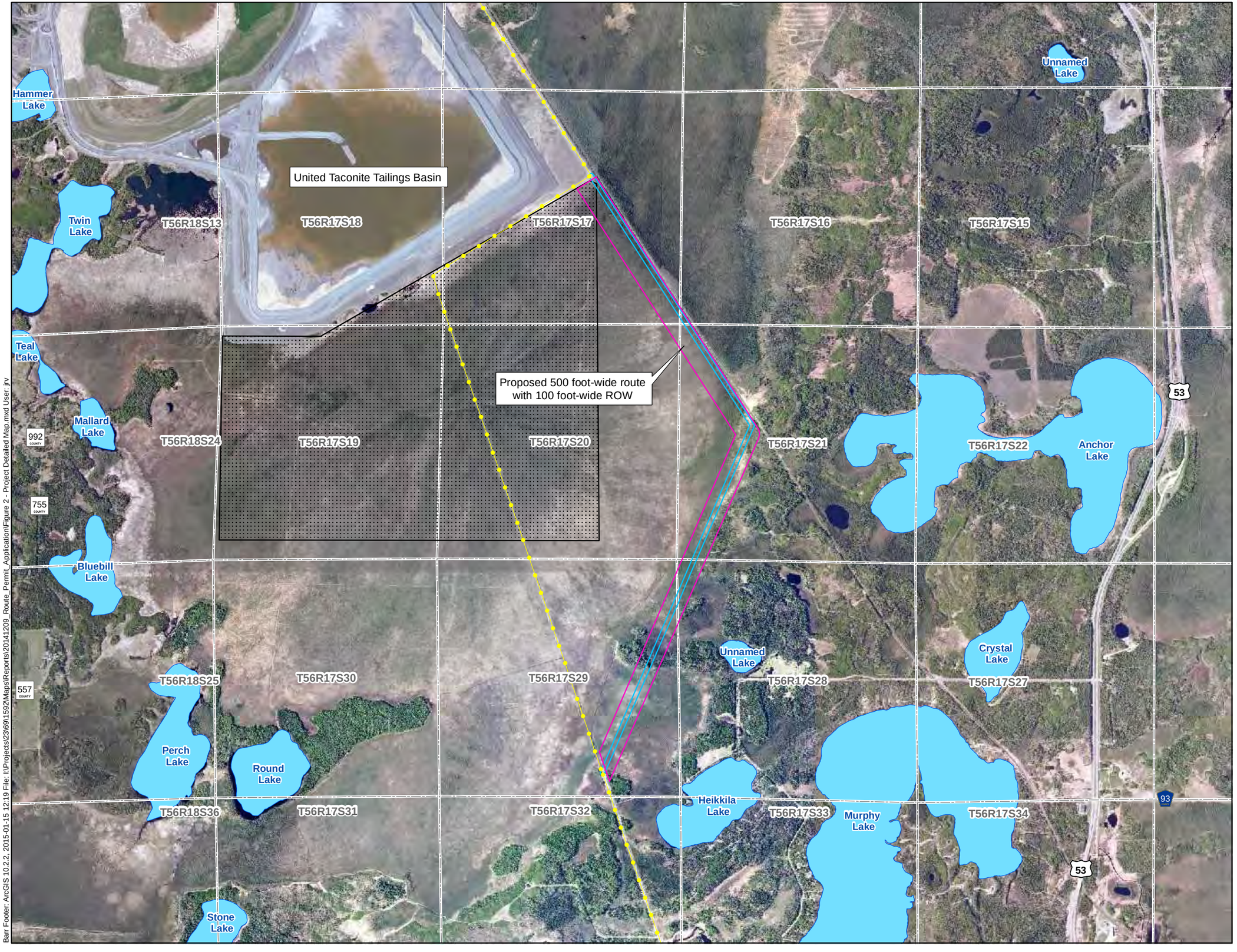
N

0 2,000 4,000 Feet

Figure 1

PROJECT OVERVIEW
Proposed 16 Line Reroute
Saint Louis County, MN

Barr Footer: ArcGIS 10.2.2, 2015-01-14 07:38 File: I:\Projects\23\691\592\Maps\Reports\20141209_Route_Permit_Application\Figure 1 - Project Overview.mxd User: jrv



Existing 16 Line

Proposed 16 Line 100 foot-wide ROW

Proposed 16 Line 500 foot-wide Route

PWI Basin

Tailings Basin Expansion Area

Public Land Survey Sections

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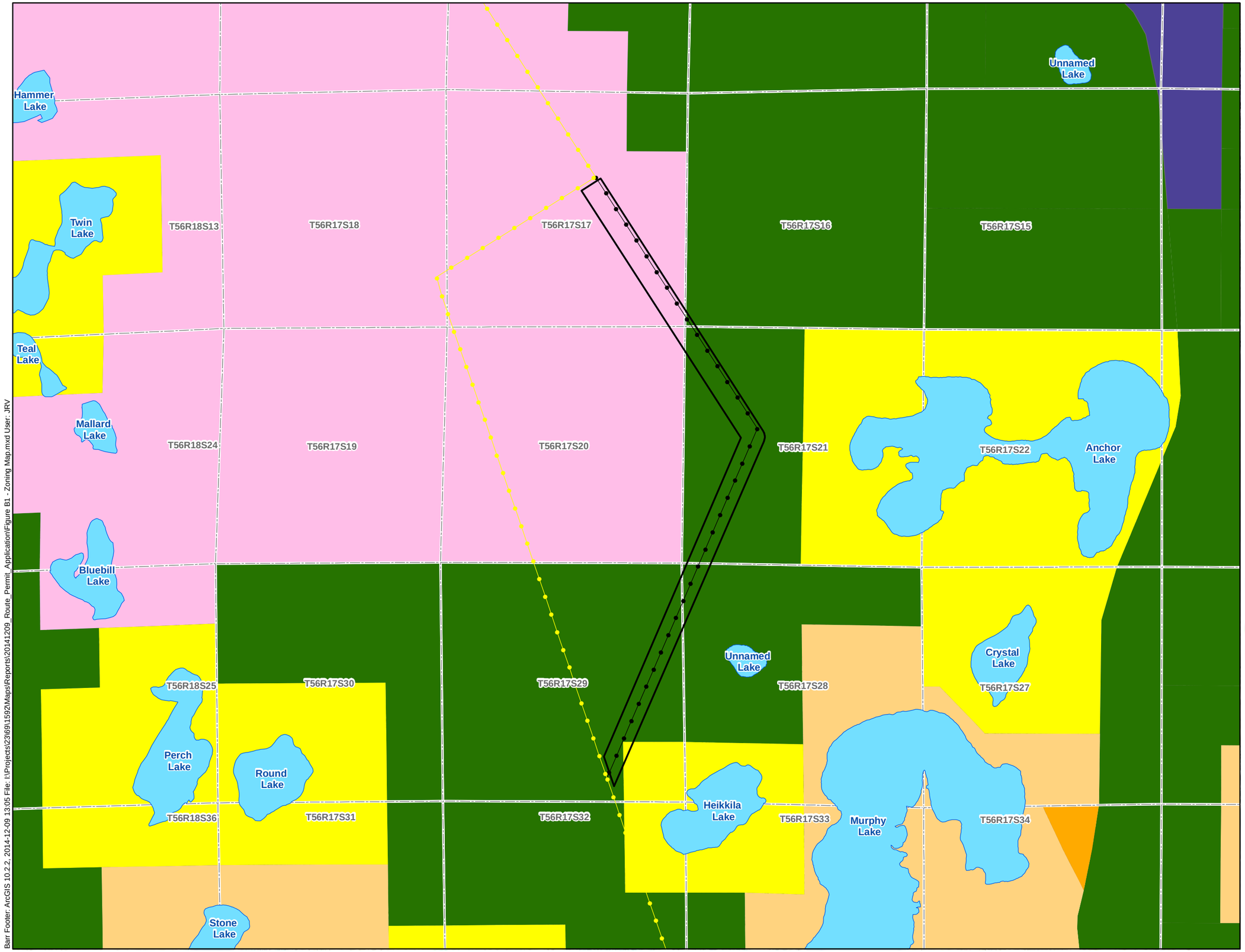
N

0 2,000 4,000 Feet

Figure 2

PROJECT DETAILED MAP
Proposed 16 Line Reroute
Saint Louis County, MN

Barr Footer: ArcGIS 10.2.2, 2015-01-15 12:19 File: I:\Projects\23691\1592\Maps\Reports\20141209_Route_Permit_Application\Figure 2 - Project Detailed Map.mxd User: jrv



Existing 16 Line

Proposed 16 Line 500 foot-wide Route

Public Land Survey Sections

Zoning Classification

(St. Louis County)

- Forest Agricultural Management
- Industrial
- Multiple Use Non - Shoreland
- Non - Shoreland Commercial
- Residential
- Shoreland Mixed Use
- PWI Basin

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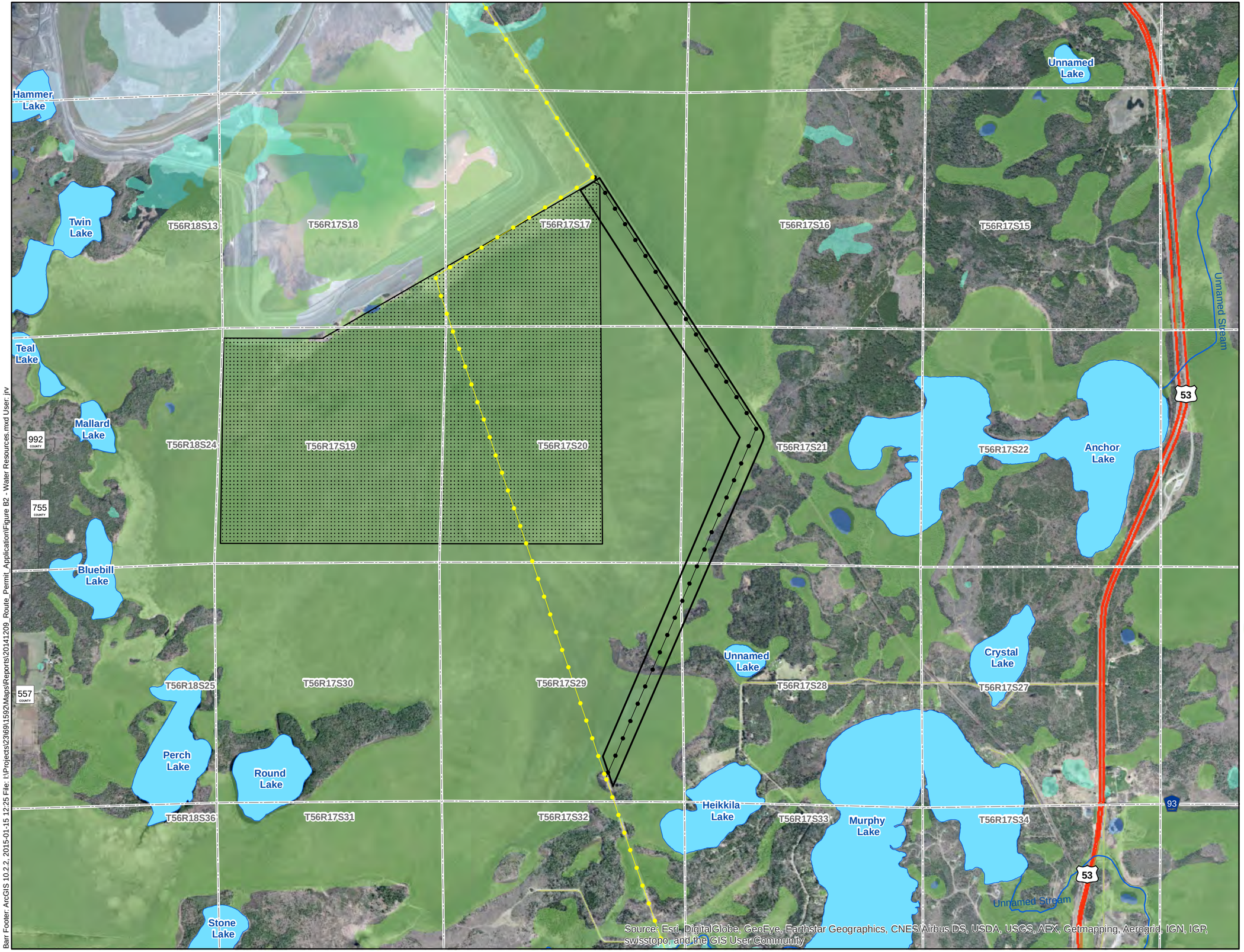
N

0 2,000 4,000 Feet

Figure B1

ZONING MAP
Proposed 16 Line Reroute
Saint Louis County, MN

Barr Footer: ArcGIS 10.2.2, 2014-12-09 13:05 File: I:\Projects\23\69\1592\Maps\Reports\20141209_Route_Permit_Application\Figure B1 - Zoning Map.mxd User: JRV



Barr Footer: ArcGIS 10.2.2, 2015-01-15 12:25 File: I:\Projects\23\69\1592\Maps\Reports\20141209_Route_Permit_Application\Figure B2 - Water Resources.mxd User: jrv

- Proposed 16 Line Alignment
- Proposed 16 Line 500 foot-wide Route
- Existing 16 Line
- Tailings Basin Expansion Area
- Public Land Survey Sections
- PWI Basin
- Public Water Inventory Watercourses.lyr

Wetlands (National Wetlands Inventory)

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake

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N

0 2,000 4,000 Feet

Figure B2

WATER RESOURCES
Proposed 16 Line Reroute
Saint Louis County, MN

Hammer Lake
Twin Lake
Teal Lake
Mallard Lake
Bluebill Lake
Perch Lake
Round Lake
Stone Lake
Unnamed Lake
Heikkila Lake
Unnamed Lake
Crystal Lake
Anchor Lake
Murphy Lake

Proposed 16 Line Alignment
Proposed 16 Line 500 foot-wide Route
Existing 16 Line
PWI Basin

Land Cover
(USGS Gap Analysis Program)

- Water
- Aspen/White Birch
- Barren
- Black Ash
- Cropland
- Developed
- Grassland
- Lowland Black Spruce
- Lowland Deciduous
- Lowland Northern White-Cedar
- Lowland Shrub
- Maple/Basswood
- Marsh
- Oak
- Pine
- Spruce/Fir
- Tamarack
- Upland Conifer-Deciduous mix
- Upland Shrub

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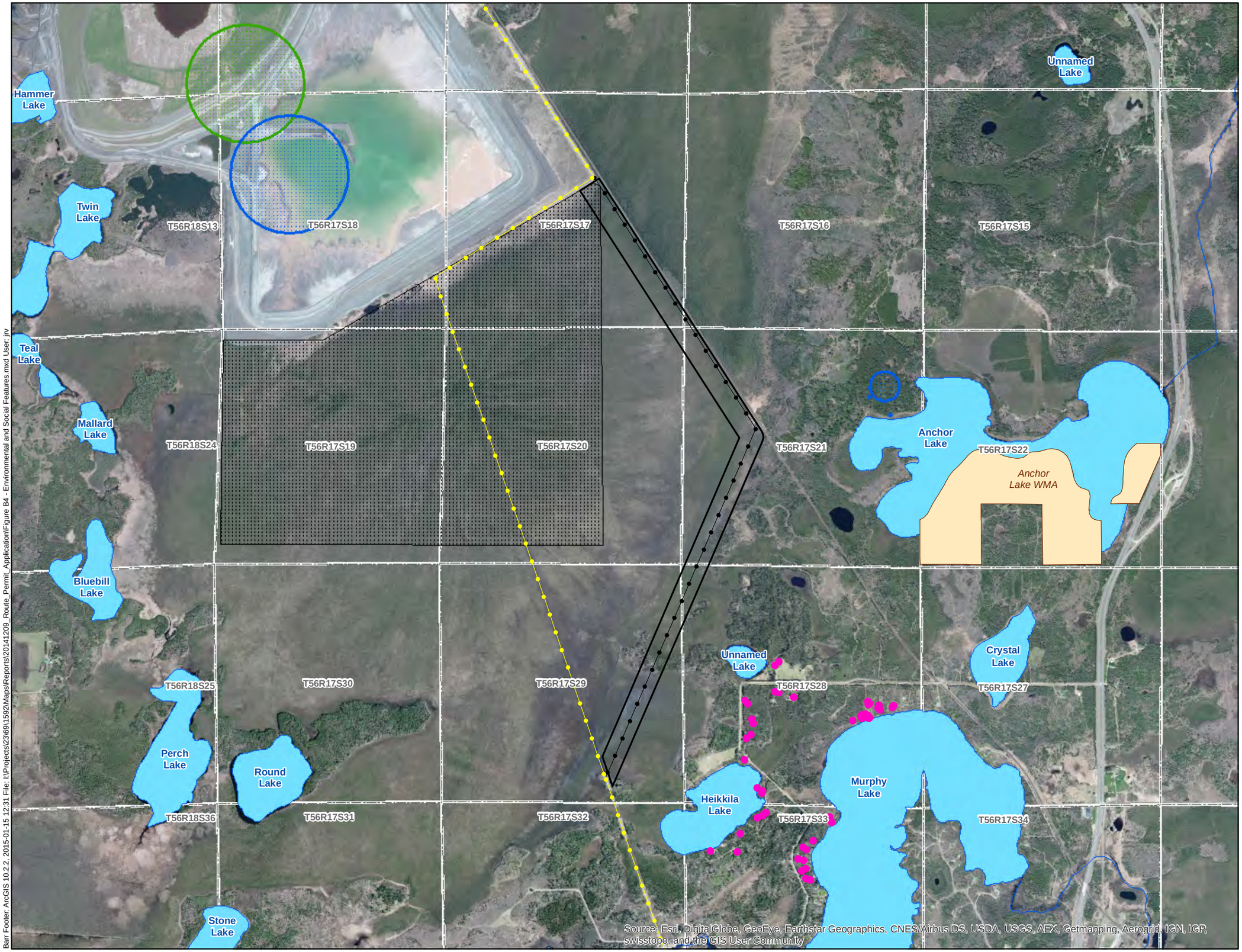
N

0 2,000 4,000 Feet

Figure B3

LAND COVER
Proposed 16 Line Reroute
Saint Louis County, MN

Barr Footer: ArcGIS 10.2.2, 2014-12-09 10:44 File: I:\Projects\23\69\1592\Maps\Reports\20141209_Route_Permit_Application\Figure B3 - Land Cover.mxd User: JRV



Proposed 16 Line Alignment

Proposed 16 Line 500 foot-wide Route

Existing 16 Line

Tailings Basin Expansion Area

Public Land Survey Sections

Wildlife Management Area

T&E Species*

Vertebrate Animal

Animal Assemblage

Residential Buildings

PWI Basin

PWI Watercourse

*Rare features data included here were provided by the Natural Heritage and Nongame Research Program of the Division of Ecological Services, Minnesota Department of Natural Resources (DNR), and were current as of 05/15/13

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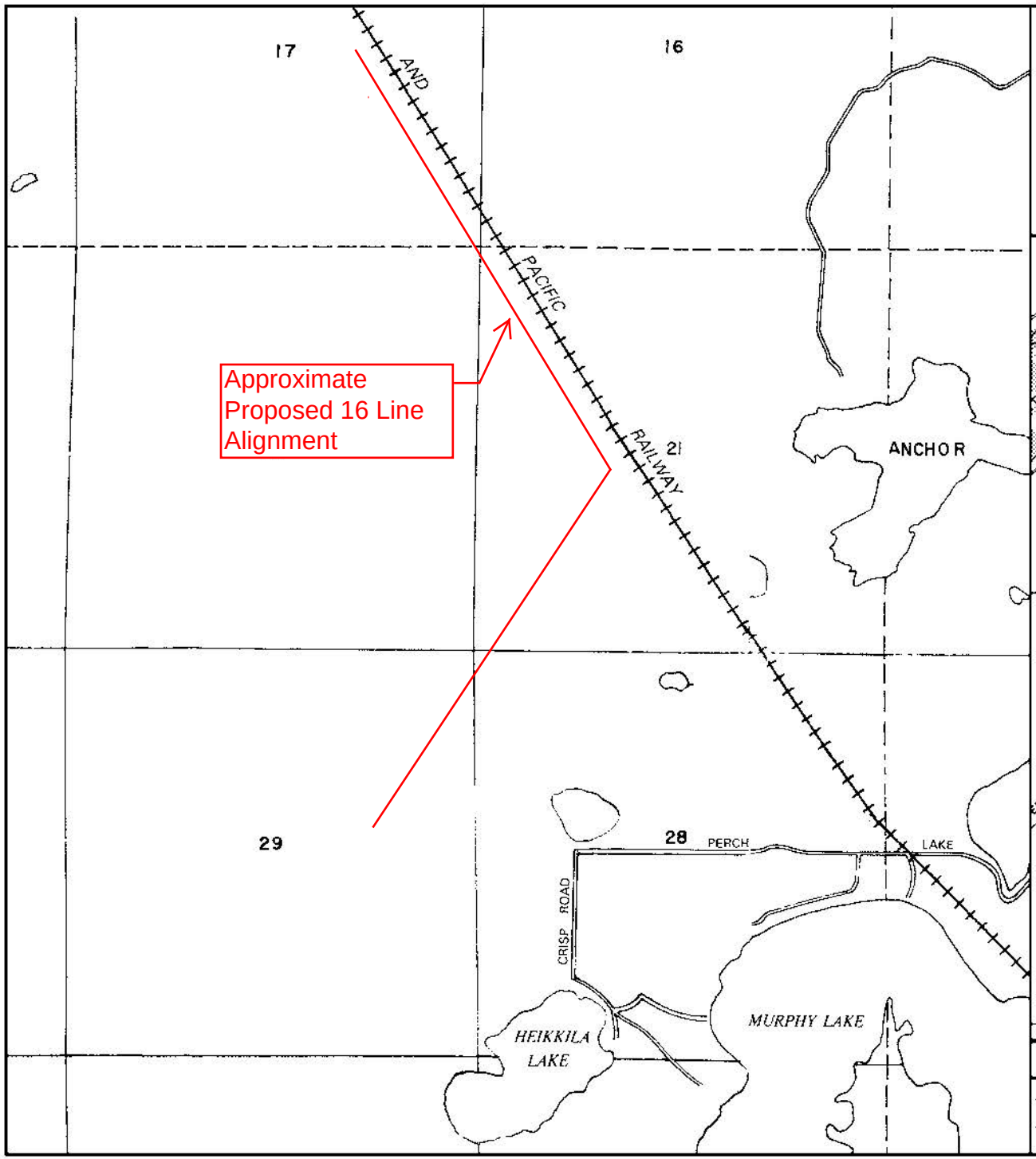
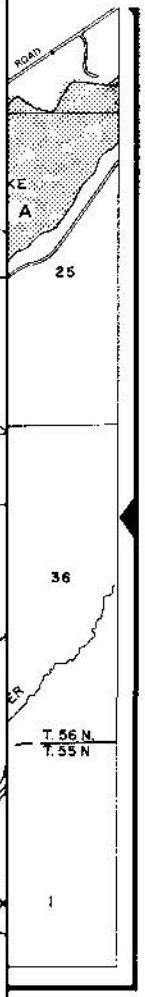
N

0 2,000 4,000 Feet

Figure B4

ENVIRONMENTAL AND SOCIAL FEATURES
Proposed 16 Line Reroute
Saint Louis County, MN





the National Flood Insurance Program at (800) 638-6620.

APPROXIMATE SCALE IN FEET

2000 0

NATIONAL FLOOD INSURANCE PROGRAM

FIRM

FLOOD INSURANCE RATE MAP

ST. LOUIS COUNTY, MINNESOTA
(UNINCORPORATED AREAS)

PANEL 1075 OF 1675
(SEE MAP INDEX FOR PANELS NOT PRINTED)

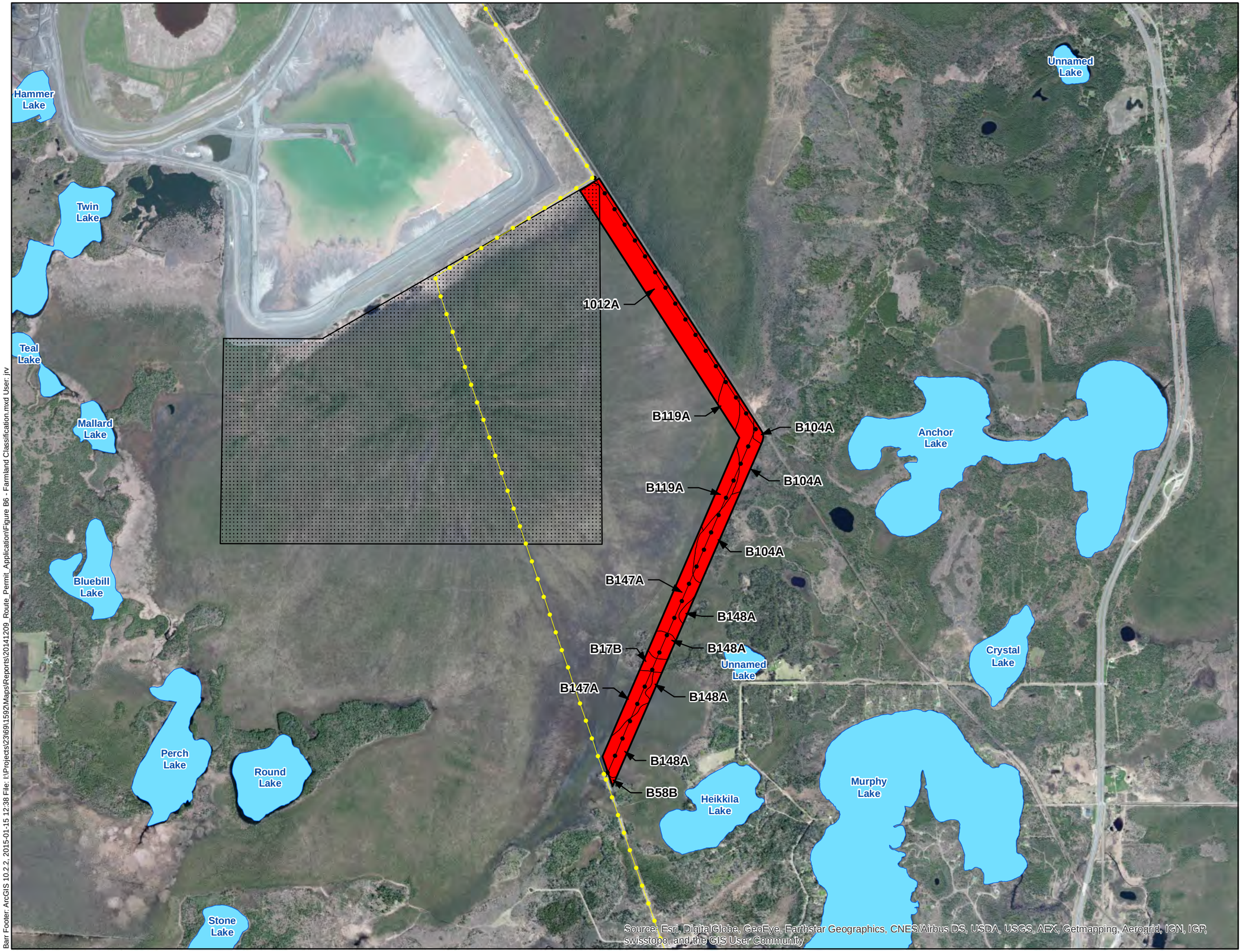
INCLUDES:

TOWNSHIP NAME	NUMBER
FAYAL	270739

COMMUNITY–PANEL NUMBER:
270416 1075 C

EFFECTIVE DATE:
FEBRUARY 19, 1992

Federal Emergency Management Agency



Proposed 16 Line Alignment

Proposed 16 Line 500 foot-wide Route

Existing 16 Line

PWI Basin

Tailings Basin Expansion Area

NRCS Farmland Classification

Not prime farmland

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AN ALLETE COMPANY

N

0 2,000 4,000 Feet

Figure B6

FARMLAND CLASSIFICATION
Proposed 16 Line Reroute
Saint Louis County, MN

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Appendix C

Landowner List

MINNESOTA POWER
16 LINE RE-ROUTE
LANDOWNER LIST

Public Land Survey System			Landowner
Section	**Township**	**Range**	
17	56N	17W	Utac C/O Cliffs Natural Resources
16	56N	17N	Minnesota DNR-State School Land
20	56N	17N	Utac C/O Cliffs Natural Resources
21	56N	17N	Minnesota DNR
21	56N	17N	Minnesota DNR
21	56N	17N	Minnesota DNR
21	56N	17N	Minnesota DNR
21	56N	17N	Minnesota DNR
21	56N	17N	St. Louis County, Lands and Minerals
28	56N	17N	Harold G and Joan M Converse
29	56N	17N	Minnesota DNR
29	56N	17N	Minnesota DNR
29	56N	17N	Minnesota DNR
29	56N	17N	Minnesota DNR
29	56N	17N	St. Louis County, Lands and Minerals
29	56N	17N	St. Louis County, Lands and Minerals

Appendix D

Notification Letters

minnesota power

AN ALLETE COMPANY

November 21, 2014

Administrative Office
St. Louis County Historical Society
506 West Michigan Street
Duluth, MN 55802

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

To whom it may concern:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

Description of the Project

A project map is attached for your reference (see **Figure 1**). The Project would be located in Township 56N-Range 17W-Sections 16, 17, 20, 21, 28 and 29 in St. Louis County, MN.

The Project consists of constructing an approximately 3-mile-long, 115 kV transmission line reroute of Minnesota Power's existing 16 Line. The reroute would originate on the east side of United Taconite's existing tailings basin and proceed southeast parallel to an existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line, as shown on **Figure 1**.

Please note that Minnesota Power is in the process of evaluating route information and collecting comments and input. The proposed route location shown on **Figure 1** is preliminary and subject to refinement through this process.

We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the RPA. Written comments are required by December 22, 2014 for consideration in this study. Please submit written comments via email or letter to Dan McCourtney and Bill Snellman at:

Dan McCourtney
dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

The proposed 115 kV transmission line reroute meets the definition of a High Voltage Transmission Line (HVTL) under Minn. Rules Chapter 7850.1000, subp. 9. As the Project qualifies for the Alternative Permitting Process under Minn. Stat. §216E.04, subd. 2(3) and pursuant to Minn. Rules Chapter 7850.2800 to 7850.3900 (see Minn. Rules Chapter 7850.2800, subp. 1(C)), Minnesota Power may elect to use this Alternative Permitting Process.

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An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Gary Kuyava
St. Louis County Inspector
Minnesota Department of Agriculture
560 West Wabasha Road
Duluth, MN 55803

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Kuyava:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Amy Loiselle
St. Louis Area Hydrologist
MN Department of Natural Resources Ecological and Water Resources - Region 2
7979 Highway 37
Eveleth, MN 55734

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Loiselle:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Joe Rokala
Regional Operations Supervisor
MN Department of Natural Resources Lands and Minerals - Region 2
1201 East Highway 2
Grand Rapids, MN 55744

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Rokala:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
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Duluth, MN 55802

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Lisa Joyal
Natural Heritage Review Coordinator
Minnesota Department of Natural Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Joyal:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Suzanne Hanson
Duluth Region Manager
MN Pollution Control Agency Northeast Region
525 Lake Ave. South, Suite 400
Duluth, MN 55802

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Hanson:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Leslie Day
Project Manager
US Army Corps of Engineers - St. Louis County
1554 Highway 2, Suite 2
Two Harbors, MN 55616

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Day:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Beth Petrowske
Public Affairs Coordinator
MN Department of Transportation - District 1
1123 Mesaba Ave
Duluth, MN 55811

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Petrowske:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the RPA. Written comments are required by December 22, 2014 for consideration in this study. Please submit written comments via email or letter to Dan McCourtney and Bill Snellman at:

Dan McCourtney
dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

The proposed 115 kV transmission line reroute meets the definition of a High Voltage Transmission Line (HVTL) under Minn. Rules Chapter 7850.1000, subp. 9. As the Project qualifies for the Alternative Permitting Process under Minn. Stat. §216E.04, subd. 2(3) and pursuant to Minn. Rules Chapter 7850.2800 to 7850.3900 (see Minn. Rules Chapter 7850.2800, subp. 1(C)), Minnesota Power may elect to use this Alternative Permitting Process.

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An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Duane Hill
District Engineer
MN Department of Transportation - District 1
1123 Mesaba Ave
Duluth, MN 55811

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Hill:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

Description of the Project

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ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Dr. Burl Haar
Executive Secretary
MN Public Utilities Commission
127 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Haar:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Gary Ulman
Airport Manager - Contact person
Eveleth-Virginia Municipal Airport
4280 Miller Trunk Road
Eveleth, MN 55734

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Ulman:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
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325 South Lake Avenue, Suite 700
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The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Tony Sullins
Field Supervisor
U.S. Fish and Wildlife Service - Twin Cities
4101 American Boulevard E.
Bloomington, MN 55425

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Sullins:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Barbara Mitchell Howard
Deputy State Historic Preservation Officer
MN State Historic Preservation Office
345 Kellogg Blvd W
St. Paul, MN 55102

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Mitchell Howard:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Scott Anfinson
State Archaeologist
Minnesota Office of the State Archaeologist
Fort Snelling History Center
St. Paul, MN 55111-4061

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Anfinson:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Don Baloun
State Conservationist
Natural Resources Conservation Service - Minnesota
375 Jackson St., Suite 600
St. Paul, MN 55101

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Baloun:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Robert Vlaisavljevich
Mayor
City of Eveleth
City Hall, 413 Pierce Street
Eveleth, MN 55734

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Vlaisavljevich:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

Description of the Project

A project map is attached for your reference (see **Figure 1**). The Project would be located in Township 56N-Range 17W-Sections 16, 17, 20, 21, 28 and 29 in St. Louis County, MN.

The Project consists of constructing an approximately 3-mile-long, 115 kV transmission line reroute of Minnesota Power's existing 16 Line. The reroute would originate on the east side of United Taconite's existing tailings basin and proceed southeast parallel to an existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line, as shown on **Figure 1**.

Please note that Minnesota Power is in the process of evaluating route information and collecting comments and input. The proposed route location shown on **Figure 1** is preliminary and subject to refinement through this process.

We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the RPA. Written comments are required by December 22, 2014 for consideration in this study. Please submit written comments via email or letter to Dan McCourtney and Bill Snellman at:

Dan McCourtney
dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

The proposed 115 kV transmission line reroute meets the definition of a High Voltage Transmission Line (HVTL) under Minn. Rules Chapter 7850.1000, subp. 9. As the Project qualifies for the Alternative Permitting Process under Minn. Stat. §216E.04, subd. 2(3) and pursuant to Minn. Rules Chapter 7850.2800 to 7850.3900 (see Minn. Rules Chapter 7850.2800, subp. 1(C)), Minnesota Power may elect to use this Alternative Permitting Process.

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An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Jackie Monahan-Junek
City Administrator
City of Eveleth
City Hall, 413 Pierce Street
Eveleth, MN 55734

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Monahan-Junek:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Mark St. Lawrence
Environmental Administrator
St. Louis County Environmental Services
307 First Street South, Suite 115
Virginia, MN 55792

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. St. Lawrence:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Ted Troolin
Director
St. Louis County Environmental Services
307 First Street South, Suite 115
Virginia, MN 55792

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Troolin:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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Bill Snellman
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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

John Strukel
Solid Waste Supervisor
St. Louis County Environmental Services
307 First Street South, Suite 115
Virginia, MN 55792

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Strukel:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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ALLETE/Minnesota Power
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Bill Snellman
bsnellman@barr.com
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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Kevin Gray
County Administrator
St. Louis County Administration
100 N. 5th Ave W.
Duluth, MN 55802

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Gray:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Jack Huhta
Planning Commission Chairman
St. Louis County Planning Commission
307 S. First Street
Virginia, MN 55792

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Huhta:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Mark Johnson
Local Water Planning Contact
St. Louis County Planning Department
227 West 1st Street
Duluth, MN 55802

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Johnson:

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An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Scott Smith
County Zoning Contact
St. Louis County Zoning Office
227 West 1st Street, 100 Missabe Building
Duluth, MN 55802

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Smith:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

Description of the Project

A project map is attached for your reference (see **Figure 1**). The Project would be located in Township 56N-Range 17W-Sections 16, 17, 20, 21, 28 and 29 in St. Louis County, MN.

The Project consists of constructing an approximately 3-mile-long, 115 kV transmission line reroute of Minnesota Power's existing 16 Line. The reroute would originate on the east side of United Taconite's existing tailings basin and proceed southeast parallel to an existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line, as shown on **Figure 1**.

Please note that Minnesota Power is in the process of evaluating route information and collecting comments and input. The proposed route location shown on **Figure 1** is preliminary and subject to refinement through this process.

We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the RPA. Written comments are required by December 22, 2014 for consideration in this study. Please submit written comments via email or letter to Dan McCourtney and Bill Snellman at:

Dan McCourtney
dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

The proposed 115 kV transmission line reroute meets the definition of a High Voltage Transmission Line (HVTL) under Minn. Rules Chapter 7850.1000, subp. 9. As the Project qualifies for the Alternative Permitting Process under Minn. Stat. §216E.04, subd. 2(3) and pursuant to Minn. Rules Chapter 7850.2800 to 7850.3900 (see Minn. Rules Chapter 7850.2800, subp. 1(C)), Minnesota Power may elect to use this Alternative Permitting Process.

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An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Keith Nelson
District 6 Commissioner
St. Louis County Board
300 South 5th Ave
Virginia, MN 55792

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Nelson:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Barbara Hayden
Director
St. Louis County Planning & Community Development
227 West 1st Street, 100 Missabe Building
Duluth, MN 55802

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Hayden:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Jim Foldesi
Public Works Director
St. Louis County Public Works
4787 Midway Road
Duluth, MN 55811

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Foldesi:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
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The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

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If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Connie Olson
Office Administrator
St. Louis County North Soil and Water Conservation District
230 1st Street South, Suite 104B
Virginia, MN 55792

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Olson:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
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The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

John Calgaro
Board of Supervisors - District 4
St. Louis County North Soil and Water Conservation District
230 1st Street South, Suite 104B
Virginia, MN 55792

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Calgaro:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Mark Lindhorst
WCA Contact
St. Louis County - Minnesota Wetland Conservation Act
307 S. First Street
Virginia, MN 55792

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Lindhorst:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Tony Mancuso
Property Management Director
St. Louis County Administrative
100 N. 5th Ave W.
Duluth, MN 55802

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Mancuso:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the RPA. Written comments are required by December 22, 2014 for consideration in this study. Please submit written comments via email or letter to Dan McCourtney and Bill Snellman at:

Dan McCourtney
dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

The proposed 115 kV transmission line reroute meets the definition of a High Voltage Transmission Line (HVTL) under Minn. Rules Chapter 7850.1000, subp. 9. As the Project qualifies for the Alternative Permitting Process under Minn. Stat. §216E.04, subd. 2(3) and pursuant to Minn. Rules Chapter 7850.2800 to 7850.3900 (see Minn. Rules Chapter 7850.2800, subp. 1(C)), Minnesota Power may elect to use this Alternative Permitting Process.

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An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Mark Webber
Land Commissioner
St. Louis County Land
320 West 2nd St. Room 607
Duluth, MN 55802

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Webber:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

Description of the Project

A project map is attached for your reference (see **Figure 1**). The Project would be located in Township 56N-Range 17W-Sections 16, 17, 20, 21, 28 and 29 in St. Louis County, MN.

The Project consists of constructing an approximately 3-mile-long, 115 kV transmission line reroute of Minnesota Power's existing 16 Line. The reroute would originate on the east side of United Taconite's existing tailings basin and proceed southeast parallel to an existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line, as shown on **Figure 1**.

Please note that Minnesota Power is in the process of evaluating route information and collecting comments and input. The proposed route location shown on **Figure 1** is preliminary and subject to refinement through this process.

We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the RPA. Written comments are required by December 22, 2014 for consideration in this study. Please submit written comments via email or letter to Dan McCourtney and Bill Snellman at:

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dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

The proposed 115 kV transmission line reroute meets the definition of a High Voltage Transmission Line (HVTL) under Minn. Rules Chapter 7850.1000, subp. 9. As the Project qualifies for the Alternative Permitting Process under Minn. Stat. §216E.04, subd. 2(3) and pursuant to Minn. Rules Chapter 7850.2800 to 7850.3900 (see Minn. Rules Chapter 7850.2800, subp. 1(C)), Minnesota Power may elect to use this Alternative Permitting Process.

The Route Permit proceedings will determine where the proposed transmission line is located. As part of the permitting process, the MPUC considers input from the applicant utility, interested stakeholders, local government units, state and federal agencies, and landowners who may be affected by the Project. Additional environmental review will occur during the routing process. The routing process will consider environmental, land use, and other potential routing impacts, and provide further opportunities for the public to comment.

An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Wayne Bergstedt
Engineering Tech Principal
St. Louis County Public Works
4787 Midway Road
Duluth, MN 55811

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Mr. Bergstedt:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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The Project consists of constructing an approximately 3-mile-long, 115 kV transmission line reroute of Minnesota Power's existing 16 Line. The reroute would originate on the east side of United Taconite's existing tailings basin and proceed southeast parallel to an existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line, as shown on **Figure 1**.

Please note that Minnesota Power is in the process of evaluating route information and collecting comments and input. The proposed route location shown on **Figure 1** is preliminary and subject to refinement through this process.

We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the RPA. Written comments are required by December 22, 2014 for consideration in this study. Please submit written comments via email or letter to Dan McCourtney and Bill Snellman at:

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dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

The proposed 115 kV transmission line reroute meets the definition of a High Voltage Transmission Line (HVTL) under Minn. Rules Chapter 7850.1000, subp. 9. As the Project qualifies for the Alternative Permitting Process under Minn. Stat. §216E.04, subd. 2(3) and pursuant to Minn. Rules Chapter 7850.2800 to 7850.3900 (see Minn. Rules Chapter 7850.2800, subp. 1(C)), Minnesota Power may elect to use this Alternative Permitting Process.

The Route Permit proceedings will determine where the proposed transmission line is located. As part of the permitting process, the MPUC considers input from the applicant utility, interested stakeholders, local government units, state and federal agencies, and landowners who may be affected by the Project. Additional environmental review will occur during the routing process. The routing process will consider environmental, land use, and other potential routing impacts, and provide further opportunities for the public to comment.

An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

minnesota power

AN ALLETE COMPANY

November 21, 2014

Mary Beth Kafut
Library Director
City of Eveleth
614 Pierce Street
Eveleth, MN 55734

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear Ms. Kafut:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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Please note that Minnesota Power is in the process of evaluating route information and collecting comments and input. The proposed route location shown on **Figure 1** is preliminary and subject to refinement through this process.

We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the RPA. Written comments are required by December 22, 2014 for consideration in this study. Please submit written comments via email or letter to Dan McCourtney and Bill Snellman at:

Dan McCourtney
dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

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An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

AFFIDAVIT OF MAILING

STATE OF MINNESOTA)
) ss.
COUNTY OF St. Louis)

Beth Gucinski, being duly sworn on oath, deposes and states that on the

21st day of November, 2014, s/he served the attached

Notice of Proposed Transmission Line Project upon

Robert Vlaisavljevich, Jackie Monahan-Junek, Mark St. Lawrence, Ted Troolin, John Strukel, Kevin Gray, Jack Huhta, Mark Johnson, Scott Smith, Keith Nelson, Barbara Hayden, Jim Foldesi, Connie Olson, John Calgaro, Mark Lindhorst, Tony Mancuso, Mark Webber, Wayne Bergstedt, St. Louis County Historical Society Administrative Office, Gary Kuyava, Amy Loiselle, Joe Rokala, Lisa Joyal, Suzanne Hanson, Leslie Day, Beth Petrowske, Duane Hill, Dr. Burl Haar, Gary Ulman, Tony Sullins, Barbara Mitchell Howard, Scott Anfinson, Don Baloun, and Mary Beth Kafut

by depositing a true and correct copy thereof in the United States mailbox / post office located at

325 South Lake Avenue, Suite 700, Duluth, MN 55802 with postage prepaid

thereon.

Signed: Beth Gucinski

Subscribed and sworn to before me this

21 day of November, 2014.

Tara L. VanDerHeul
Notary Public

TARA LYNN VANDENHEUVEL
NOTARY PUBLIC
MINNESOTA
My Commission Expires Jan. 31, 2018

minnesota power

AN ALLETE COMPANY

November 21, 2014

<<Insert Contact Name>>
<<Insert Entity>>
<<Insert Address>>
<<Insert City, State, Zip>>

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear <<Insert Contact Name>>:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

The purpose of this letter is to provide notice of Minnesota Power's plan to obtain a Route Permit from the Minnesota Public Utilities Commission (MPUC) for the proposed Project. Minnesota Power plans to submit a Route Permit Application (RPA) to the MPUC within a few months. We request your questions or comments regarding the Project prior to filing the RPA with the MPUC. Input will be solicited during an open house on December 10, 2014 and by mail/email. Details for both options are provided below.

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The Project consists of constructing an approximately 3-mile-long, 115 kV transmission line reroute of Minnesota Power's existing 16 Line. The reroute would originate on the east side of United Taconite's existing tailings basin and proceed southeast parallel to an existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line, as shown on **Figure 1**.

Please note that Minnesota Power is in the process of evaluating route information and collecting comments and input. The proposed route location shown on **Figure 1** is preliminary and subject to refinement through this process.

We are particularly interested in environmental permits and approvals that may be required. Copies of all correspondence received in response to this letter will be included with the RPA. Written comments are required by December 22, 2014 for consideration in this study. Please submit written comments via email or letter to Dan McCourtney and Bill Snellman at:

Dan McCourtney
dmccourtney@allete.com
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
bsnellman@barr.com
Barr Engineering
325 South Lake Avenue, Suite 700
Duluth, MN 55802

The proposed Project will cross over wetlands throughout its route. Minnesota Power plans to propose a 500-foot-wide route with the MPUC. The proposed transmission line will be constructed within a 100-foot-wide right-of-way located within the 500-foot-wide route corridor.

Permitting Requirements

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An informational open house regarding this project is being held at the **Fayal Township Community Center located at 4375 Shady Ln, Eveleth, MN 55734, on Wednesday, December 10, 2014 from 6:30PM to 7:30PM**. You are welcome and encouraged to attend.

If additional information is needed or desired regarding the proposed project, please contact me by email (dmccourtney@allete.com) or by phone (218.355.3515).

Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

AFFIDAVIT OF MAILING

STATE OF MINNESOTA)
) ss.
COUNTY OF St. Louis)

Beth Gucinski, being duly sworn on oath, deposes and states that on the 21st day of November, 2014, s/he served the attached Notice of Proposed Transmission Line Project upon Gabe Johnson, Joe Rokala, Mark Kailanen, and Harold G and Joan M Converse

by depositing a true and correct copy thereof in the United States mailbox / post office located at 325 South Lake Avenue, Suite 700, Duluth, MN 55802 with postage prepaid thereon.

Signed: Beth Gucinski

Subscribed and sworn to before me this
21 day of November, 2014.
Tara L VanDenHeuvel
Notary Public

TARA LYNN VANDENHEUVEL
NOTARY PUBLIC
MINNESOTA
My Commission Expires Jan. 31, 2018

minnesota power

AN ALLETE COMPANY

November 21, 2014

<<Insert Contact Name>>
<<Insert Entity>>
<<Insert Address>>
<<Insert City, State, Zip>>

Re: Notice of Proposed Transmission Line Project
Minnesota Power
16 Line Reroute Project – St. Louis County, Minnesota

Dear <<Insert Contact Name>>:

Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute in St. Louis County south of Fayal Township, Minnesota. This project is referred to as the 16 Line Reroute Project (Project). The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

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Sincerely,

Daniel McCourtney
Minnesota Power
Siting and Permitting

Enclosure: **Figure 1**

December 17, 2014

Lisa Joyal
Natural Heritage Review Coordinator
Division of Ecological Resources
Minnesota Department of Natural Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155

Re: Request for comments on Proposed Minnesota Power 16 Line Reroute High-Voltage Transmission Line Project

Dear Ms. Joyal:

Barr Engineering Company (Barr) is assisting Minnesota Power with the environmental review for the proposed 16 Line Reroute High-Voltage Transmission Line (HVTL) Project (Project), discussed below. On behalf of Minnesota Power, Barr requests your review of the Project for potential effects on state-listed species.

The proposed Project is located in Sections 16, 17, 21, 28, and 29 of Township 56N, Range 17W, St. Louis County, Minnesota (see attached **Figure 1**). Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute. The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

Description of the Project

The Project consists of constructing an approximately 3-mile-long, 115 kV transmission line reroute of Minnesota Power's existing 16 Line. The reroute would originate on the east side of United Taconite's existing tailings basin and proceed southeast parallel to an existing railroad grade for approximately 1.25 miles. The line would then shift southwest for approximately 1.75 miles where it would reconnect to Minnesota Power's existing 16 Line, as shown on **Figure 1**.

Please note that Minnesota Power is in the process of evaluating route information and collecting comments and input. The proposed route location shown on **Figure 1** is preliminary and subject to refinement through this process.

NHIS Data

Barr maintains a license agreement with the Minnesota Department of Natural Resources (MN DNR) Natural Heritage Information System (NHIS) database. Barr has queried the database for rare resources located within one mile of the proposed 16 Line Reroute; this information is shown on **Figure 1**. According to the NHIS database, a bald eagle nest (*Haliaeetus leucocephalus*) was documented over one-half mile from the southern extent of the proposed Project area. Additionally, a northern goshawk (*Accipiter gentilis*) territory with five nests was identified approximately one-half mile from the proposed Project area, near Anchor Lake.

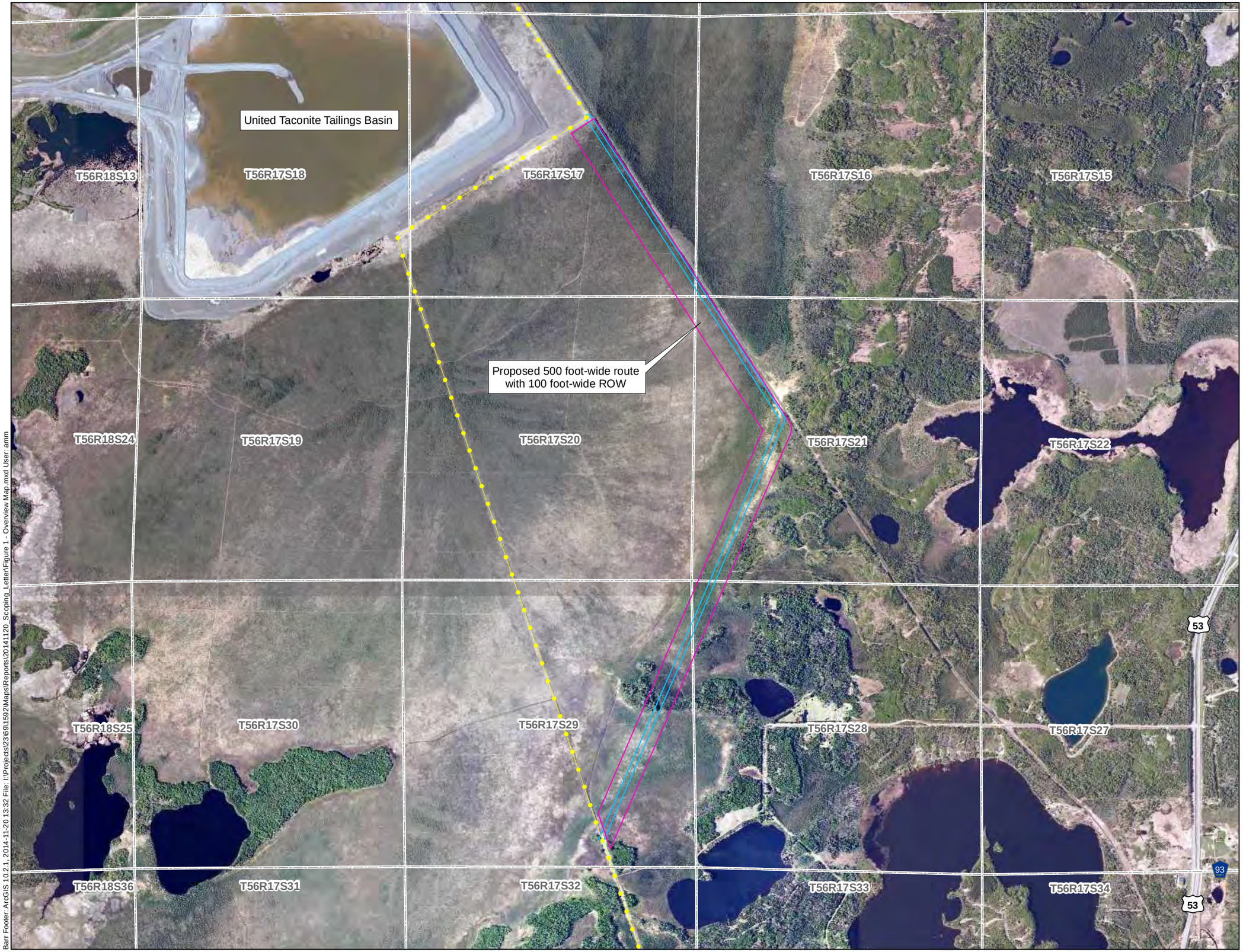
Because the majority of the proposed Project is located well outside of recommended buffer distances of these nests and is primarily in unfavorable nesting habitat (scrub-shrub wetland), it is not likely that the proposed Project would no effect on bald eagle or northern goshawk populations within the area. Additionally, all work is currently scheduled to occur outside of the nesting season of both species. Please provide comments regarding the proposed Project and any updates to the NHIS database that should be discussed for the proposed Project.

If you require further information or have questions regarding the proposed Project, please contact me at 218-529-7117. We look forward to hearing from you soon.

Sincerely,

Emily Jurgens
Environmental Scientist
Barr Engineering Co.

Enclosure: Figure 1



Existing 16 Line
Proposed 16 Line 100 foot-wide ROW
Proposed 16 Line 500 foot-wide Route
Public Land Survey Sections

minnesota power
AN ALLETE COMPANY

N

0 0.25 0.5 Miles

Figure 1

OVERVIEW MAP
Proposed 16 Line Reroute
Saint Louis County, MN

Barr Footer: ArcGIS 10.2.1, 2014-11-20 13:32 File: I:\Projects\23691592\Maps\Reports\20141120_Scoping_Letter\Figure 1 - Overview Map.mxd User: amm

resourceful. naturally.
engineering and environmental consultants

BARR

December 12, 2014

Tony Sullins
Field Supervisor
U.S. Fish and Wildlife Service – Twin cities
4101 American Boulevard East
Bloomington, MN 55425

Re: Request for comments on Proposed Minnesota Power 16 Line Reroute High-Voltage Transmission Line Project

Dear Mr. Sullins:

Barr Engineering Company (Barr) is assisting Minnesota Power with the environmental review for the proposed 16 Line Reroute High-Voltage Transmission Line (HVTL) Project (Project), discussed below. On behalf of Minnesota Power, Barr requests your review of the Project for potential effects on federally-protected species.

The proposed Project is located in Sections 16, 17, 21, 28, and 29 of Township 56N, Range 17W, St. Louis County, Minnesota (see attached **Figure 1**). Minnesota Power proposes to construct an approximately 3-mile-long, 115 kilovolt (kV) high voltage transmission line reroute. The Project is needed to accommodate a tailings basin addition proposed by United Taconite.

Description of the Project

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Please note that Minnesota Power is in the process of evaluating route information and collecting comments and input. The proposed route location shown on **Figure 1** is preliminary and subject to refinement through this process.

Rare Resources Data

Barr reviewed the Midwest Region U.S. Fish and Wildlife Service's (USFWS) list of federally threatened, endangered, proposed, and candidate species in St. Louis County. The Canada lynx (*Lynx canadensis*) and piping plover (*Charadrius melodus*) are currently listed as threatened and endangered, respectively, in this county. Proposed species include the northern long-eared bat (*Myotis septentrionalis*) and the rufa red knot (*Calidris canutus rufa*).

In addition to the USFWS data, Barr queried the Minnesota Department of Natural Resources (MN DNR) Natural Heritage Information System (NHIS) database for rare resources located within one mile of the proposed 115 kV HVTL reroute; this information is shown on **Figure 1**. According to the NHIS database, a bald eagle nest (*Haliaeetus leucocephalus*) was documented over one-half mile from the end of the proposed reroute.

Since the majority of the proposed Project is located in an area with high levels of disturbance, including the tailings basin to the west and US Highway 53 to the east, and lacks the dense, contiguous forest preferred by this species, the proposed Project would have no effect on Canada lynx. The Project would also have no effect on piping plover or rufa red knot populations. No piping plover or rufa red knot habitat is present near the proposed reroute, as both species occupy shoreline habitat. Adverse impacts to the northern long-bat are not anticipated. The active season for the northern long-eared bat is typically May 1—October 1. Currently, work is not anticipated to take place during the species active season. All tree clearing will occur between October 1 and May 1, which is outside of the species active season. Also, the project will not impact any suitable hibernacula such as caves and mines. Should the project timing change and necessitate work to occur during the species active season, further coordination with USFWS may be warranted.

The NHIS records for bald eagle nests are located well outside of the 660-foot buffer recommended in the National Bald Eagle Management Guidelines issued by USFWS in 2007. Also, work is currently scheduled to occur outside of the nesting season, and therefore the project is anticipated to have no effect on eagle populations.

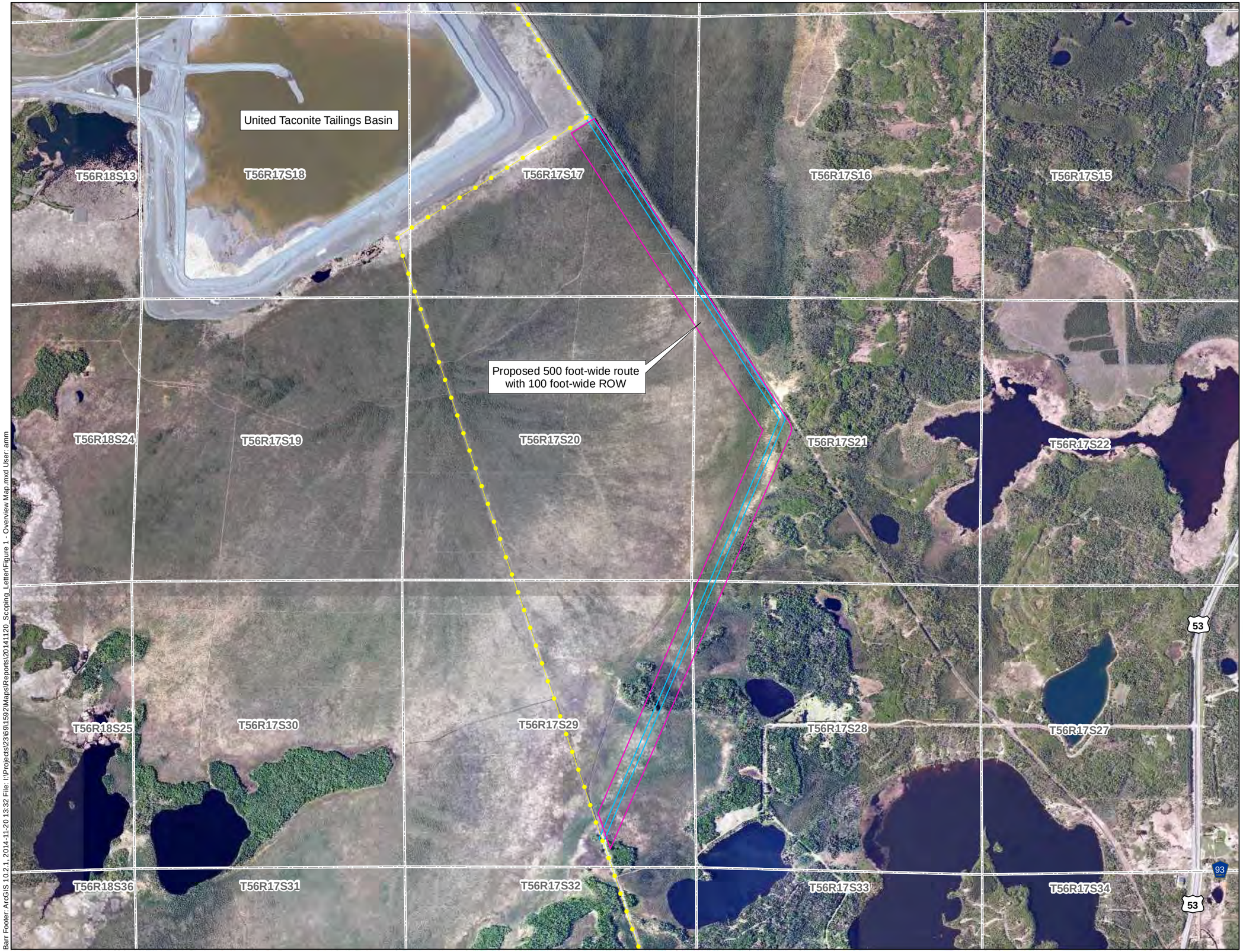
Please provide comments regarding the proposed Project and any additional data that should be discussed for the proposed Project.

If you require further information or have questions regarding the proposed Project, please contact me at 218-529-7117. We look forward to hearing from you soon.

Sincerely,

Emily Jurgens
Environmental Scientist
Barr Engineering Co.

Enclosure: Figure 1



Existing 16 Line
Proposed 16 Line 100 foot-wide ROW
Proposed 16 Line 500 foot-wide Route
Public Land Survey Sections

minnesota power
AN ALLETE COMPANY

N

0 0.25 0.5 Miles

Figure 1

OVERVIEW MAP
Proposed 16 Line Reroute
Saint Louis County, MN

Barr Footer: ArcGIS 10.2.1, 2014-11-20 13:32 File: I:\Projects\23691592\Maps\Reports\20141120_Scoping_Letter\Figure 1 - Overview Map.mxd User: amm

DEPARTMENT OF THE ARMY
ST. PAUL DISTRICT, CORPS OF ENGINEERS
180 FIFTH STREET EAST, SUITE 700
ST. PAUL MINNESOTA 55101-1678

REPLY TO
ATTENTION OF

December 8, 2014

Operations
Regulatory (2014-044137-LED)

Mr. Daniel McCourtney
Allete/Minnesota Power
30 West Superior Street
Duluth, Minnesota 55800

Dear Mr. McCourtney:

Thank you for providing preliminary information for Minnesota Power's proposed 3-mile long 16 Line Reroute Project for Corps review and comments prior to the submittal of an application. As identified on the maps submitted to the Corps, the 16 Line Reroute Project would involve the installation of 115 kV high voltage overhead transmission line across Sections 35 and 36, T. 58N., R. 18W.; Section 31, T. 58N., R. 17W.; and Sections 1617, 20, 21, 28, and 29,, T. 56N., R. 17W., St. Louis County, Minnesota.

From the information provided, it appears that the project would involve the construction of a 500-foot-wide utility corridor across aquatic resources, including wetlands, and may involve the discharge of dredged or fill material in these resources. Therefore, we believe that you may need a Department of the Army authorization prior to the start of work for this project. To assist you in the submittal of a complete application for this project, we are enclosing a copy of the Joint Application Form for Activities Affecting Water Resources in Minnesota and a list of information to provide in your application that will be necessary for the permit evaluation process. Upon the receipt of an application for this project, we will review the application and notify you of any additional information necessary to complete our review of the project.

If you have any questions, contact Ms. Leslie Day in our Duluth office at (218) 720-5291 extension 35403. In any correspondence, inquiries and the submittal of an application, please refer to the Regulatory number shown above.

Sincerely,

Leslie Day
for Tamara E. Cameron
Chief, Regulatory Branch

Enclosure:
Information List
Minnesota Joint Application Form

ENCLOSURE
Operations
Regulatory (2014-04137-LED)

INFORMATION NEEDED FOR CORPS PERMIT APPLICATION REVIEW

REQUIRED MAPS, DRAWINGS, OR PHOTOS -

☒ Show exact location of the transmission line within the right-of-way corridor.

☒ Demonstrate that you have identified the wetlands in the project right-of-way corridor using sources that could include (but are not limited to): county soil survey data, interpreted infrared satellite images, aerial photography review, or state wetland inventory maps. Wetland boundaries should be ground truthed.

☒ Identify the wetland types in the project right-of-way corridor.

☒ Identify all waterbody and waterway crossings along the project right-of-way corridor, which may include judicial ditches, intermittent tributaries, perennial unnamed tributaries, Section 10 waters, and tributaries to Section 10 waters.

☒ Identify all impacts to wetlands and waters proposed within the project right-of-way. These should be identified by both type of aquatic resource and activity type (vegetation removal versus the discharge of dredged or fill material).

FURTHER DESCRIPTIONS NEED -

☒ Demonstrate that you have minimized waterway and wetland impacts in the application; examples: consideration for the use of existing utility corridors, disturbed utility corridors, maintained corridors, etc.

EXCAVATION/FILLING -

☒ Dimensions of excavation/fill areas along the project corridor in wetlands for the placement of overhead utility poles and/or other structures.

TEMPORARY FILL PLACEMENT -

☒ Determine whether there would be temporary placement of fill material; if so, identify the purpose of this fill, list exact location, and determine the dimensions/area of fill .

CONSTRUCTION METHODS –

☒ Describe the methods of construction, including equipment, timing, and the locations and methods for access routes and staging areas.

CONVERSION –

☒ Identify all areas within the corridor where vegetation removal would result in the conversion of wetland types (and calculate areas of conversion by wetland type).

☒ Describe how vegetation removal (mechanized versus non-mechanized, equipment to be used) would be accomplished.

STRUCTURES –

☒ On overhead maps, identify the location (and discuss dimensions) of all proposed structure(s); utility poles/structures

ADJOINING PROPERTY OWNERS -

☒ Names and address of adjoining property owners, lessees, etc.

PURPOSE & NEED -

☒ Describe the purpose and need (with any supporting documentation) for the line reroute project.

ALTERNATIVES -

☒ Explain why there are no alternative sites or methods available that would accomplish the intended purpose of the project but would not require placement of fill in the wetland.

MITIGATION -

☒ Wetland mitigation measures may be needed for the discharge of dredged or fill material for the placement of utility poles and for the conversion of wetland types along the project corridor. Mitigation ratios could be between 0.25:1 and 1.50:1 depending upon the type of activity/impact and wetland types affected.

OTHER -

The Section 106 process needs to be completed for this project before Corps permit would be issued. If a archeological survey was previously completed for this location, provide a copy with the application.

The project would need to satisfy the state water quality standards/waivers and tribal water quality standards/exemptions.

The project should satisfy the Minnesota Lake Superior Coastal Program (MNDNR).

Please note that a 3rd party may need to ground-truth wetland areas along the project corridor and that the Corps may need to field verify the delineated aquatic resource boundaries.

Joint Application Form for Activities Affecting Water Resources in Minnesota

This joint application form is the accepted means for initiating review of proposals that may affect a water resource (wetland, tributary, lake, etc.) in the State of Minnesota under state and federal regulatory programs. Applicants for Minnesota Department of Natural Resources (DNR) Public Waters permits **MUST** use the MPARS online permitting system for submitting applications to the DNR. Applicants can use the information entered into MPARS to substitute for completing parts of this joint application form (see the paragraph on MPARS at the end of the joint application form instructions for additional information). This form is only applicable to the water resource aspects of proposed projects under state and federal regulatory programs; other local applications and approvals may be required. Depending on the nature of the project and the location and type of water resources impacted, multiple authorizations may be required as different regulatory programs have different types of jurisdiction over different types of resources.

Regulatory Review Structure

Federal

The St. Paul District of the U.S. Army Corps of Engineers (Corps) is the federal agency that regulates discharges of dredged or fill material into waters of the United States (wetlands, tributaries, lakes, etc.) under Section 404 of the Clean Water Act (CWA) and regulates work in navigable waters under Section 10 of the Rivers and Harbors Act. Applications are assigned to Corps project managers who are responsible for implementing the Corps regulatory program within a particular geographic area.

State

There are three state regulatory programs that regulate activities affecting water resources. The Wetland Conservation Act (WCA) regulates most activities affecting wetlands. It is administered by local government units (LGUs) which can be counties, townships, cities, watershed districts, watershed management organizations or state agencies (on state-owned land). The Minnesota DNR Division of Ecological and Water Resources issues permits for work in specially-designated public waters via the Public Waters Work Permit Program (DNR Public Waters Permits). The Minnesota Pollution Control Agency (MPCA) under Section 401 of the Clean Water Act certifies that discharges of dredged or fill material authorized by a federal permit or license comply with state water quality standards. One or more of these regulatory programs may be applicable to any one project.

Required Information

Prior to submitting an application, applicants are **strongly encouraged** to seek input from the Corps Project Manager and LGU staff to identify regulatory issues and required application materials for their proposed project. Project proponents can request a pre-application consultation with the Corps and LGU to discuss their proposed project by providing the information required in Sections 1 through 5 of this joint application form to facilitate a meaningful discussion about their project. Many LGUs provide a venue (such as regularly scheduled technical evaluation panel meetings) for potential applicants to discuss their projects with multiple agencies prior to submitting an application. Contact information is provided below.

The following bullets outline the information generally required for several common types of determinations/authorizations.

- For delineation approvals and/or jurisdictional determinations, submit Parts 1, 2 and 5, and Attachment A.
- For activities involving CWA/WCA exemptions, WCA no-loss determinations, and activities not requiring mitigation, submit Parts 1 through 5, and Attachment B.
- For activities requiring compensatory mitigation/replacement plan, submit Parts 1 thru 5, and Attachments C and D.
- For local road authority activities that qualify for the state's local road wetland replacement program, submit Parts 1 through 5, and Attachments C, D (if applicable), and E to both the Corps and the LGU.

Submission Instructions

Send the completed joint application form and all required attachments to:

U.S Army Corps of Engineers. Applications may be sent directly to the appropriate Corps Office. For a current listing of areas of responsibilities and contact information, visit the St. Paul District's website at: http://www.mvp.usace.army.mil/Missions/Regulatory.aspx and select "Minnesota" from the contact Information box. Alternatively, applications may be sent directly to the St. Paul District Headquarters and the Corps will forward them to the appropriate field office.

Section 401 Water Quality Certification: Applicants do not need to submit the joint application form to the MPCA unless specifically requested. The MPCA will request a copy of the completed joint application form directly from an applicant when they determine an individual 401 water quality certification is required for a proposed project.

Wetland Conservation Act Local Government Unit: Send to the appropriate Local Government Unit. If necessary, contact your county Soil and Water Conservation District (SWCD) office or visit the Board of Water and Soil Resources (BWSR) web site (www.bwsr.state.mn.us) to determine the appropriate LGU.

DNR Public Waters Permitting: In 2014 the DNR will begin using the Minnesota DNR Permitting and Reporting System (MPARS) for submission of Public Waters permit applications (https://webapps11.dnr.state.mn.us/mpars/public/authentication/login). Applicants for Public Waters permits **MUST** use the MPARS online permitting system for submitting applications to the DNR. To avoid duplication and to streamline the application process among the various resource agencies, applicants can use the information entered into MPARS to substitute for completing parts of this joint application form. The MPARS print/save function will provide the applicant with a copy of the Public Waters permit application which, at a minimum, will satisfy Parts one and two of this joint application. For certain types of activities, the MPARS application may also provide all of the necessary information required under Parts three and four of the joint application. However, it is the responsibility of the Applicant to make sure that the joint application contains all of the required information, including identification of all aquatic resources impacted by the project (see Part four of the joint application). After confirming that the MPARS application contains all of the required information in Parts one and two the Applicant may attach a copy to the joint application and fill in any missing information in the remainder of the joint application.

Project Name and/or Number:

PART ONE: Applicant Information

If applicant is an entity (company, government entity, partnership, etc.), an authorized contact person must be identified. If the applicant is using an agent (consultant, lawyer, or other third party) and has authorized them to act on their behalf, the agent's contact information must also be provided.

Applicant/Landowner Name:
Mailing Address:
Phone:
E-mail Address:

Authorized Contact (do not complete if same as above):
Mailing Address:
Phone:
E-mail Address:

Agent Name:
Mailing Address:
Phone:
E-mail Address:

PART TWO: Site Location Information

County: **City/Township:**
Parcel ID and/or Address:
Legal Description (Section, Township, Range):
Lat/Long (decimal degrees):
Attach a map showing the location of the site in relation to local streets, roads, highways.
Approximate size of site (acres) or if a linear project, length (feet):

If you know that your proposal will require an individual Permit from the U.S. Army Corps of Engineers, you must provide the names and addresses of all property owners adjacent to the project site. This information may be provided by attaching a list to your application or by using block 25 of the Application for Department of the Army permit which can be obtained at:

http://www.mvp.usace.army.mil/Portals/57/docs/regulatory/RegulatoryDocs/engform_4345_2012oct.pdf

PART THREE: General Project/Site Information

If this application is related to a delineation approval, exemption determination, jurisdictional determination, or other correspondence submitted ***prior to*** this application then describe that here and provide the Corps of Engineers project number.

Describe the project that is being proposed, the project purpose and need, and schedule for implementation and completion. The project description must fully describe the nature and scope of the proposed activity including a description of all project elements that effect aquatic resources (wetland, lake, tributary, etc.) and must also include plans and cross section or profile drawings showing the location, character, and dimensions of all proposed activities and aquatic resource impacts.

Project Name and/or Number:

PART FOUR: Aquatic Resource Impact[1] Summary

If your proposed project involves a direct or indirect impact to an aquatic resource (wetland, lake, tributary, etc.) identify each impact in the table below. Include all anticipated impacts, including those expected to be temporary. Attach an overhead view map, aerial photo, and/or drawing showing all of the aquatic resources in the project area and the location(s) of the proposed impacts. Label each aquatic resource on the map with a reference number or letter and identify the impacts in the following table.

Aquatic Resource ID (as noted on overhead view)	**Aquatic Resource Type** (wetland, lake, tributary etc.)	**Type of Impact** (fill, excavate, drain, or remove vegetation)	**Duration of Impact** Permanent (P) or Temporary (T)[1]	**Size of Impact**[2]	**Overall Size of Aquatic Resource** [3]	**Existing Plant Community Type(s)** in Impact Area[4]	**County, Major Watershed #, and Bank Service Area #** of Impact Area[5]

[1]If impacts are temporary; enter the duration of the impacts in days next to the "T". For example, a project with a temporary access fill that would be removed after 220 days would be entered "T (220)".
[2]Impacts less than 0.01 acre should be reported in square feet. Impacts 0.01 acre or greater should be reported as acres and rounded to the nearest 0.01 acre. Tributary impacts must be reported in linear feet of impact and an area of impact by indicating first the linear feet of impact along the flowline of the stream followed by the area impact in parentheses). For example, a project that impacts 50 feet of a stream that is 6 feet wide would be reported as 50 ft (300 square feet).
[3]This is generally only applicable if you are applying for a de minimis exemption under MN Rules 8420.0420 Subp. 8, otherwise enter "N/A".
[4]Use *Wetland Plants and Plant Community Types of Minnesota and Wisconsin* 3rd Ed. as modified in MN Rules 8420.0405 Subp. 2.
[5]Refer to Major Watershed and Bank Service Area maps in MN Rules 8420.0522 Subp. 7.

If any of the above identified impacts have already occurred, identify which impacts they are and the circumstances associated with each:

PART FIVE: Applicant Signature

☐ Check here if you are requesting a pre-application consultation with the Corps and LGU based on the information you have provided. Regulatory entities will not initiate a formal application review if this box is checked.

By signature below, I attest that the information in this application is complete and accurate. I further attest that I possess the authority to undertake the work described herein.

Signature: _____ Date:

I hereby authorize _____ to act on my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this application.

[1] **The term "impact" as used in this joint application form is a generic term used for disclosure purposes to identify activities that may require approval from one or more regulatory agencies. For purposes of this form it is not meant to indicate whether or not those activities may require mitigation/replacement.**

Project Name and/or Number:

Attachment A
Request for Delineation Review, Wetland Type Determination, or Jurisdictional Determination

By submission of the enclosed wetland delineation report, I am requesting that the U.S. Army Corps of Engineers, St. Paul District (Corps) and/or the Wetland Conservation Act Local Government Unit (LGU) provide me with the following (check all that apply):

☐ **Wetland Type Confirmation**

☐ **Delineation Concurrence.** Concurrence with a delineation is a written notification from the Corps and a decision from the LGU concurring, not concurring, or commenting on the boundaries of the aquatic resources delineated on the property. Delineation concurrences are generally valid for five years unless site conditions change. Under this request alone, the Corps will not address the jurisdictional status of the aquatic resources on the property, only the boundaries of the resources within the review area (including wetlands, tributaries, lakes, etc.).

☐ **Preliminary Jurisdictional Determination.** A preliminary jurisdictional determination (PJD) is a non-binding written indication from the Corps that waters, including wetlands, identified on a parcel may be waters of the United States. For purposes of computation of impacts and compensatory mitigation requirements, a permit decision made on the basis of a PJD will treat all waters and wetlands in the review area as if they are jurisdictional waters of the U.S. PJDs are advisory in nature and may not be appealed.

☐ **Approved Jurisdictional Determination.** An approved jurisdictional determination (AJD) is an official Corps determination that jurisdictional waters of the United States are either present or absent on the property. AJDs can generally be relied upon by the affected party for five years. An AJD may be appealed through the Corps administrative appeal process.

In order for the Corps and LGU to process your request, the wetland delineation must be prepared in accordance with the 1987 Corps of Engineers Wetland Delineation Manual, any approved Regional Supplements to the 1987 Manual, and the *Guidelines for Submitting Wetland Delineations in Minnesota* (2013).
http://www.mvp.usace.army.mil/Missions/Regulatory/DelineationJDGuidance.aspx

Project Name and/or Number:

Attachment B
Supporting Information for Applications Involving Exemptions, No Loss Determinations, and Activities Not Requiring Mitigation

Complete this part ***if*** you maintain that the identified aquatic resource impacts in Part Four do not require wetland replacement/compensatory mitigation OR ***if*** you are seeking verification that the proposed water resource impacts are either exempt from replacement or are not under CWA/WCA jurisdiction.

Identify the specific exemption or no-loss provision for which you believe your project or site qualifies:

Provide a detailed explanation of how your project or site qualifies for the above. Be specific and provide and refer to attachments and exhibits that support your contention. Applicants should refer to rules (e.g. WCA rules), guidance documents (e.g. BWSR guidance, Corps guidance letters/public notices), and permit conditions (e.g. Corps General Permit conditions) to determine the necessary information to support the application. Applicants are strongly encouraged to contact the WCA LGU and Corps Project Manager prior to submitting an application if they are unsure of what type of information to provide:

Project Name and/or Number:

Attachment C
Avoidance and Minimization

Project Purpose, Need, and Requirements. Clearly state the purpose of your project and need for your project. Also include a description of any specific requirements of the project as they relate to project location, project footprint, water management, and any other applicable requirements. Attach an overhead plan sheet showing all relevant features of the project (buildings, roads, etc.), aquatic resource features (impact areas noted) and construction details (grading plans, storm water management plans, etc.), referencing these as necessary:

Avoidance. Both the CWA and the WCA require that impacts to aquatic resources be avoided if practicable alternatives exist. Clearly describe all on-site measures considered to avoid impacts to aquatic resources and discuss at least two project alternatives that avoid all impacts to aquatic resources on the site. These alternatives may include alternative site plans, alternate sites, and/or not doing the project. Alternatives should be feasible and prudent (see MN Rules 8420.0520 Subp. 2 C). Applicants are encouraged to attach drawings and plans to support their analysis:

Minimization. Both the CWA and the WCA require that all unavoidable impacts to aquatic resources be minimized to the greatest extent practicable. Discuss all features of the proposed project that have been modified to minimize the impacts to water resources (see MN Rules 8420.0520 Subp. 4):

Off-Site Alternatives. An off-site alternatives analysis is not required for all permit applications. If you know that your proposal will require an individual permit (standard permit or letter of permission) from the U.S. Army Corps of Engineers, you may be required to provide an off-site alternatives analysis. The alternatives analysis is not required for a complete application but must be provided during the review process in order for the Corps to complete the evaluation of your application and reach a final decision. Applicants with questions about when an off-site alternatives analysis is required should contact their Corps Project Manager.

Project Name and/or Number:

Attachment D
Replacement/Compensatory Mitigation

Complete this part *if* your application involves wetland replacement/compensatory mitigation not associated with the local road wetland replacement program. Applicants should consult Corps mitigation guidelines and WCA rules for requirements.

Replacement/Compensatory Mitigation via Wetland Banking. Complete this section if you are proposing to use credits from an existing wetland bank (with an account number in the State wetland banking system) for all or part of your replacement/compensatory mitigation requirements.

Wetland Bank Account #	County	Major Watershed #	Bank Service Area #	Credit Type (if applicable)	Number of Credits

Applicants should attach documentation indicating that they have contacted the wetland bank account owner and reached at least a tentative agreement to utilize the identified credits for the project. This documentation could be a signed purchase agreement, signed application for withdrawal of credits or some other correspondence indicating an agreement between the applicant and the bank owner. *However, applicants are advised not to enter into a binding agreement to purchase credits until the mitigation plan is approved by the Corps and LGU.*

Project-Specific Replacement/Permittee Responsible Mitigation. Complete this section if you are proposing to pursue actions (restoration, creation, preservation, etc.) to generate wetland replacement/compensatory mitigation credits for this proposed project.

WCA Action Eligible for Credit[1]	Corps Mitigation Compensation Technique[2]	Acres	Credit % Requested	Credits Anticipated[3]	County	Major Watershed #	Bank Service Area #

[1]Refer to the name and subpart number in MN Rule 8420.0526.
[2]Refer to the technique listed in *St. Paul District Policy for Wetland Compensatory Mitigation in Minnesota*.
[3]If WCA and Corps crediting differs, then enter both numbers and distinguish which is Corps and which is WCA.

Explain how each proposed action or technique will be completed (e.g. wetland hydrology will be restored by breaking the tile.....) and how the proposal meets the crediting criteria associated with it. Applicants should refer to the Corps mitigation policy language, WCA rule language, and all associated Corps and WCA guidance related to the action or technique:

Attach a site location map, soils map, recent aerial photograph, and any other maps to show the location and other relevant features of each wetland replacement/mitigation site. Discuss in detail existing vegetation, existing landscape features, land use (on and surrounding the site), existing soils, drainage systems (if present), and water sources and movement. Include a topographic map showing key features related to hydrology and water flow (inlets, outlets, ditches, pumps, etc.):

Project Name and/or Number:

Attach a map of the existing aquatic resources, associated delineation report, and any documentation of regulatory review or approval. Discuss as necessary:

For actions involving construction activities, attach construction plans and specifications with all relevant details. Discuss and provide documentation of a hydrologic and hydraulic analysis of the site to define existing conditions, predict project outcomes, identify specific project performance standards and avoid adverse offsite impacts. Plans and specifications should be prepared by a licensed engineer following standard engineering practices. Discuss anticipated construction sequence and timing:

For projects involving vegetation restoration, provide a vegetation establishment plan that includes information on site preparation, seed mixes and plant materials, seeding/planting plan (attach seeding/planting zone map), planting/seeding methods, vegetation maintenance, and an anticipated schedule of activities:

For projects involving construction or vegetation restoration, identify and discuss goals and specific outcomes that can be determined for credit allocation. Provide a proposed credit allocation table tied to outcomes:

Provide a five-year monitoring plan to address project outcomes and credit allocation:

Discuss and provide evidence of ownership or rights to conduct wetland replacement/mitigation on each site:

Quantify all proposed wetland credits and compare to wetland impacts to identify a proposed wetland replacement ratio. Discuss how this replacement ratio is consistent with Corps and WCA requirements:

By signature below, the applicant attests to the following (only required if application involves project-specific/permittee responsible replacement):

- All proposed replacement wetlands were not:
  - Previously restored or created under a prior approved replacement plan or permit
  - Drained or filled under an exemption during the previous 10 years
  - Restored with financial assistance from public conservation programs
  - Restored using private funds, other than landowner funds, unless the funds are paid back with interest to the individual or organization that funded the restoration and the individual or organization notifies the local government unit in writing that the restored wetland may be considered for replacement.
- The wetland will be replaced before or concurrent with the actual draining or filling of a wetland.
- An irrevocable bank letter of credit, performance bond, or other acceptable security will be provided to guarantee successful completion of the wetland replacement.
- Within 30 days of either receiving approval of this application or beginning work on the project, I will record the Declaration of Restrictions and Covenants on the deed for the property on which the replacement wetland(s) will be located and submit proof of such recording to the LGU and the Corps.

Applicant or Representative: Title:

Signature: _____ Date:

Project Name and/or Number:

Attachment E
Local Road Replacement Program Qualification

Complete this part *if* you are a local road authority (county highway department, city transportation department, etc.) seeking verification that your project (or a portion of your project) qualifies for the MN Local Government Road Wetland Replacement Program (LGRWRP). If portions of your project are not eligible for the LGRWRP, then Attachment D should be completed and attached to your application.

Discuss how your project is a repair, rehabilitation, reconstruction, or replacement of a currently serviceable road to meet state/federal design or safety standards/requirements. Applicants should identify the specific road deficiencies and how the project will rectify them. Attach supporting documents and information as applicable:

Provide a map, plan, and/or aerial photograph accurately depicting wetland boundaries within the project area. Attach associated delineation/determination report or otherwise explain the method(s) used to identify and delineate wetlands. Also attach and discuss any type of review or approval of wetland boundaries or other aspects of the project by a member or members of the local Technical Evaluation Panel (TEP) or Corps of Engineers:

In the table below, identify only the wetland impacts from Part 4 that the road authority has determined should qualify for the LGRWRP.

Wetland Impact ID (as noted on overhead view)	**Type of Impact** (fill, excavate, drain)	**Size of Impact** (square feet or acres to 0.01)	**Existing Plant Community Type(s)** in Impact Area[1]	**County, Major Watershed #, and Bank Service Area #** of Impact[2]

[1]Use *Wetland Plants and Plant Community Types of Minnesota and Wisconsin* 3rd Ed. as modified in MN Rules 8420.0405 Subp. 2.

[2]Refer to Major Watershed and Bank Service Area maps in MN Rules 8420.0522 Subp. 7.

Discuss the feasibility of providing onsite compensatory mitigation/replacement for important site-specific wetland functions:

Please note that under the MN Wetland Conservation Act, projects with less than 10,000 square feet of wetland impact are allowed to commence prior to submission of this notification so long as the notification is submitted within 30 days of the impact. The Clean Water Act has no such provision and requires that permits be obtained prior to any regulated discharges into water of the United States. To avoid potential unauthorized activities, road authorities must, at a minimum, provide a complete application to the Corps and receive a permit prior to commencing work.

By signature below, the road authority attests that they have followed the process in MN Rules 8420.0544 and have determined that the wetland impacts identified in Attachment D are eligible for the MN Local Government Road Wetland Replacement Program.

Road Authority Representative: Title:

Signature: _____ Date:

Technical Evaluation Panel Concurrence: Project Name and/or Number:

TEP member: Representing:

Concur with road authority's determination of qualification for the local road wetland replacement program? ☐ Yes ☐ No

Signature: _____ Date:

TEP member: Representing:

Concur with road authority's determination of qualification for the local road wetland replacement program? ☐ Yes ☐ No

Signature: _____ Date:

TEP member: Representing:

Concur with road authority's determination of qualification for the local road wetland replacement program? ☐ Yes ☐ No

Signature: _____ Date:

TEP member: Representing:

Concur with road authority's determination of qualification for the local road wetland replacement program? ☐ Yes ☐ No

Signature: _____ Date:

Upon approval and signature by the TEP, application must be sent to: **Wetland Bank Administration**
Minnesota Board of Water & Soil Resources
520 Lafayette Road North
Saint Paul, MN 55155

From:	Estabrooks, Tom (MPCA)
To:	Dan McCourtney (dmccourtney@allete.com); Bill Snellman
Cc:	Carey, Patrick (MPCA)
Subject:	16 Line Reroute Project, St. Louis County
Date:	Wednesday, December 17, 2014 11:08:37 AM

Dan and Bill,

Thank you for contacting the Minnesota Pollution Control Agency (MPCA) regarding Minnesota Power's proposed 16 Line high voltage transmission line rerouting project. Depending upon the methods of construction and the extent of construction impacts, the project may require two permits or approvals from MPCA:

- The project may require coverage under a National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Construction Stormwater General Permit. Please refer to the attached fact sheet for guidance on Linear Utility Projects: http://www.pca.state.mn.us/index.php/view-document.html?gid=7411 . If you have any questions, please contact Jim Dexter of MPCA at: james.dexter@state.mn.us, or at (218)-302-6632.

- The project may require a Clean Water Act Section 401 Water Quality Certification determination from MPCA, depending upon the permitting mechanism provided by the U.S. Army Corps of Engineers. Questions regarding the 401 program can be directed to Jim Brist of MPCA at: jim.brist@state.mn.us, or at (651) 757-2245.

We look forward to participating in the environmental review process for this project. If you have any questions concerning this email, please contact me via email, or at (218) 302-6608. Sincerely, Tom Estabrooks

Tom Estabrooks | Watershed Project Manager | Minnesota Pollution Control Agency | 525 South Lake Avenue, Suite 400, Duluth, MN 55802 | Phone: (218) 302-6608 | Email: tom.estabrooks@state.mn.us | Web: www.pca.state.mn.us

From:	Estabrooks, Tom (MPCA)
To:	Dan McCourtney (dmccourtney@allete.com); Bill Snellman
Cc:	Carey, Patrick (MPCA)
Subject:	16 Line Reroute Project, St. Louis County
Date:	Wednesday, December 17, 2014 11:08:37 AM

Dan and Bill,

Thank you for contacting the Minnesota Pollution Control Agency (MPCA) regarding Minnesota Power's proposed 16 Line high voltage transmission line rerouting project. Depending upon the methods of construction and the extent of construction impacts, the project may require two permits or approvals from MPCA:

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USDA

United States Department of Agriculture

December 18, 2014

Dan McCourtney
ALLETE/Minnesota Power
30 West Superior Street
Duluth, MN 55802

IN REPLY REFER TO: 16 Line Reroute Project

Dear Mr. McCourtney:

The Natural Resources Conservation Service (NRCS) has reviewed the above referenced Project. No USDA easements will be impacted. The project sponsors are not USDA program benefit recipients, thus the wetland conservation provisions of the 1985 Food Security act, as amended are not applicable. It should be noted, however, that actions by a non-USDA participant third party (project sponsor) which impact agricultural wetlands owned or operated by USDA participants, may jeopardize the owner/operators USDA eligibility. If such impacts are anticipated, the owner/operator should contact the county Farm Service Agency (FSA) office to consider an application for a third party exemption.

The following agencies may have federal or state wetlands, floodplain delineation, cultural resources, water quality, air quality or threatened and endangered species jurisdiction in the proposed project, and should be consulted.

- Army Corps of Engineers (USACOE) – Clean Water Act
- US Fish and Wildlife Service (FWS) – Endangered Species Act
- Board of Water and Soil Resources (BWSR) - Minnesota Wetlands Conservation Act
- Minnesota Department of Natural Resources (MDNR)
- Minnesota Pollution Control Agency (MPCA)
- State Historic Preservation Officer/State Archaeologist (SHPO)

Finally, if as a result of your proposal you are affecting agricultural lands, and if any federal monies are involved, it is a requirement that a Farmland Policy Protection Act (FPPA) site assessment be appropriately filed. Since your project as proposed, does not appear to permanently affect agricultural land, this precludes the need for further action on this project as required by the FPPA. Should the project be modified such that agricultural land may be permanently impacted, consultation should be reinitiated.

Our agency appreciates your thorough follow up on the environmental review requirements of this project. We have no additional comments on your proposed project.

Sincerely,

RYAN GALBREATH
Environmental Review and Justice Program

cc:
Steve Cole, Assistant State Conservationist (Field Operations), NRCS, Duluth, MN

Minnesota
Historical Society
STATE HISTORIC PRESERVATION OFFICE

December 18, 2014

Dan McCourtney
ALLETE/ Minnesota Power
30 West Superior Street
Duluth, MN 55802

Bill Snellman
Barr Engineering
325 South Lake Ave, Suite 700
Duluth, MN 55802

RE: Minnesota Power 16 Line Reroute Project
T56 R17 S16, 17, 20, 21, 28, 29; St. Louis County
SHPO Number: 2015-0641

Dear Mr. McCourtney and Mr. Snellman:

Thank you for the opportunity to comment on the above project. It is being reviewed pursuant to the responsibilities given to the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

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 "Search by 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 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 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal license or permit, it should be submitted to our office by the responsible federal agency.

December 18, 2014

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson at (651) 259-3455.

Sincerely,

Sarah J. Beimers

Sarah J. Beimers, Manager
Government Programs and Compliance

Appendix E

Open House Notice Letter, Contact List, and Attendees

MINNESOTA POWER HOSTING PUBLIC OPEN HOUSE

FOR PROPOSED 16 LINE TRANSMISSION LINE REROUTE PROJECT
Wednesday, December 10, 2014 | 6:30 PM–7:30 PM

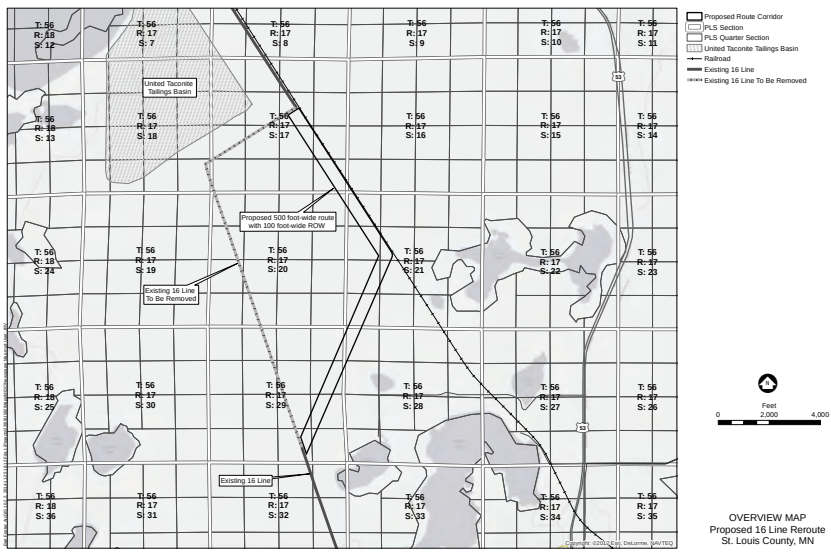
Fayal Township Community Center
4375 Shady Ln, Eveleth, MN 55734

// PROJECT DESCRIPTION //

Minnesota Power is hosting a public information open house on a proposed transmission line project in St. Louis County south of Fayal Township. To accommodate United Taconite's tailings basin addition, Minnesota Power plans to reroute approximately 3 miles of existing 115 kilovolt high voltage transmission line.

The community's views about the project are important to Minnesota Power. Project maps and information on the proposed construction, location, structure types, right-of-way and the permitting process will be available at the open house. Project staff will also be available to answer questions and provide information on how to participate in the State's Route Permit process. You are welcome to attend anytime during the hours of the open house. If you cannot attend but have input on the proposed project, please contact Daniel McCourtney, Minnesota Power Siting and Permitting, at (218) 355-3515 for project information.

Minnesota Power Contact
Daniel McCourtney
Environmental Siting and Permitting
ALLETE / Minnesota Power
30 West Superior Street
Duluth, Minnesota 55802
(218) 355-3515



minnesota power

AN ALLETE COMPANY

Minnesota Power 16 Line Open House- 12/10/14

	Name	Organization	Address (Optional)	Phone Number (Optional)
1	Tony Lischa/K		4594 Cedar Island Dr	218 744-2733
	Bob Tammen		Sudan, MN	218-753-2353
2	Pat Tammen			
	Perry Fiorini	United Taconite	5386 South Court Mt Iron	218-409-2370
3	Dan Zemski	MN Power	4421 Maple Lawn Circle	218 749 5747
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Appendix F

Cultural Resources

Two Pines Resource Group, LLC
17711 260th Street, Shafer, MN 55074
www.twopinesresource.com Phone: 651-257-4766 /Fax: 651-257-4474

December 17, 2014

Mr. Bill Snellman
Barr Engineering Co.
325 South Lake Avenue
Duluth, MN 55802

Re: *Report on the Cultural Resources File Search for the Proposed Eveleth Transmission Line Route, St. Louis County, Minnesota*

Dear Bill:

In December of 2014, Two Pines Resource Group, LLC (Two Pines) completed a literature search for the Eveleth HVTL relocation project in St. Louis County, Minnesota. This project is being undertaken by Minnesota Power. In order to accommodate the proposed expansion of an existing tailings pond, the project will take and reroute approximately 3 miles of existing 115v transmission line. This literature search was performed on behalf of Minnesota Power in support of an Environmental Impact Statement (EIS) being prepared for the project.

The purpose of this literature search is to determine if there are any previously recorded cultural resources within the study area that are listed in, or have been determined eligible for listing in the National Register of Historic Places (National Register) and to assess the area for the potential that it may contain any intact cultural resources. The study area for the literature search is a 1-mile (1.6-km) buffer around the proposed project area, which is shown on the attached map provided by your company. The study area encompasses rural portions of Township 56N Range 17W. Eva Terrell served as the Principal Investigator.

Background research was conducted at the State Historic Preservation Office (SHPO) in order to gather information on previously identified cultural resources within this one-mile buffer. Historic aerial photos, maps, and soil surveys were also consulted.

The literature search found no identified architecture-history properties or archaeological sites within the study area.

The planned route is in an area that has a low potential for containing archaeological resources due to its location in a drained yet still partially inundated tamarack bog.

The segment of 115v existing transmission line that will be taken in the course of the project has not been evaluated. The poles are of unremarkable, common H-frame construction. Its 1937

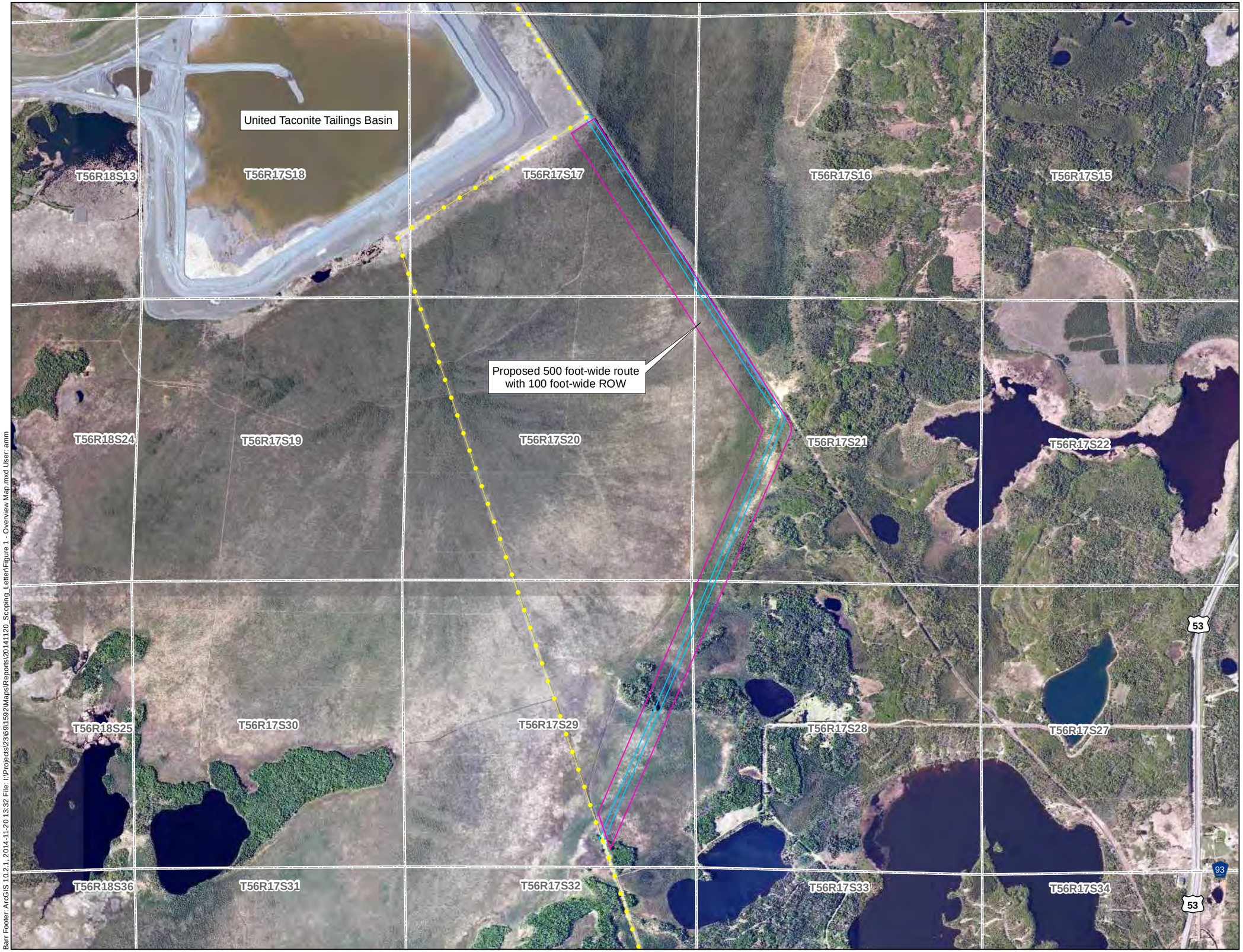
construction dates to the Rural Electrification Period. However, approximately 1.5-miles of the original corridor immediately contiguous to the north of the current project area have already been realigned to accommodate previous expansion of the same tailings pond. The existing segment that will be taken does not terminate at, or directly supply, any specific property. The remainder of the existing line will not be impacted by this undertaking.

It is our opinion that the proposed undertaking will not pose an adverse effect on any potential historic qualities of the transmission line, or cultural resources in the project area.

If you have any questions, or comments, regarding this proposal, please feel free to contact me.

Sincerely,
TWO PINES RESOURCE GROUP, LLC

Eva B. Terrell, M.A.
Principal Archaeologist and Historian



Existing 16 Line
Proposed 16 Line 100 foot-wide ROW
Proposed 16 Line 500 foot-wide Route
Public Land Survey Sections

minnesota power
AN ALLETE COMPANY

N

0 0.25 0.5 Miles

Figure 1

OVERVIEW MAP
Proposed 16 Line Reroute
Saint Louis County, MN

Barr Footer: ArcGIS 10.2.1, 2014-11-20 13:32 File: I:\Projects\23691592\Maps\Reports\20141120_Scoping_Letter\Figure 1 - Overview Map.mxd User: amm

CERTIFICATE OF SERVICE

IN THE MATTER OF THE APPLICATION OF MINNESOTA POWER FOR THE 16 LINE REROUTE PROJECT – ST. LOUIS COUNTY, MINNESOTA

MPUC DOCKET NUMBER: E015/TL-14-977

Jill N. Yeaman certifies that on the 16th day of January, 2015, she filed a true and correct copy of the **APPLICATION FOR A ROUTE PERMIT BY MINNESOTA POWER** by posting the same on on www.edockets.state.mn.us. Said document is also served via U.S. Mail or email as designated on the Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket.

/s/ Jill N. Yeaman
Jill N. Yeaman

IN THE MATTER OF THE APPLICATION OF MINNESOTA POWER FOR THE 16 LINE REROUTE PROJECT – ST. LOUIS COUNTY, MINNESOTA

MPUC DOCKET NUMBER: E015/TL-14-977

[NO SERVICE LIST EXISTS FOR ABOVE-CAPTIONED DOCKET
AS OF JANUARY 16, 2015 AT 9:00 A.M., CENTRAL STANDARD TIME]