



Minnesota Department of Natural Resources
Division of Ecological & Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

September 8, 2025

Mandy Bohnenblust
Merjent, Inc.

RE: Natural Heritage Review of the proposed ISA Transmission Line Project,
Itasca and St. Louis Counties

Dear Mandy Bohnenblust,

For all correspondence regarding the Natural Heritage Review of this project please include the project ID **MCE-2025-00541** in the email subject line.

As requested, the [Minnesota Natural Heritage Information System](#) has been reviewed to determine if the proposed project has the potential to impact any rare species or other significant natural features. Based on the project details provided with the request, the following rare features may be impacted by the proposed project:

Ecologically Significant Areas

- The Minnesota Biological Survey (MBS) has identified 13 Sites of Biodiversity Significance within the vicinity of the proposed project. One is *Outstanding*, four are *High*, and eight are *Moderate*. Sites of Biodiversity Significance (MBS Sites) have varying levels of native biodiversity and are ranked based on the relative significance of this biodiversity at a statewide level. Factors taken into account during the ranking process include the number of rare species documented within the site, the quality of the native plant communities in the site, the size of the site, and the context of the site within the landscape. There are also 36 Native Plant Communities (NPCs) in or near the proposed project area. **The DNR recommends avoidance of MBS Sites ranked *High* or *Outstanding* and NPCs ranked S1-S3.** A Conservation Planning Report, which includes a list of MBS Sites and NPCs in the proposed project area, has been created and uploaded to the project page (2025-09-03-ISATransmissionLine-CRP).

MBS Sites of Biodiversity Significance and DNR Native Plant Communities can be viewed using the Explore page in [Minnesota Conservation Explorer](#) (MCE) or their GIS shapefiles can be downloaded from the [MN Geospatial Commons](#). Reference the [MBS Site Biodiversity Significance](#) and [Native Plant Community](#) websites for information on interpreting the data. To receive a list of MBS Sites of Biodiversity Significance and DNR Native Plant Communities in the vicinity of your project, create a Conservation Planning Report using the Explore page in MCE.

- If the Wetland Conservation Act (WCA) is applicable to this project, please note that native plant communities with a Conservation Status Rank of S1 through S3 or wetlands within *High* or *Outstanding* MBS Sites of Biodiversity Significance may qualify as Rare Natural Communities (RNC) under WCA. Minnesota Rules, part 8420.0515, subpart 3 states that a wetland replacement plan for activities that modify a RNC must be denied if the local government unit determines the proposed activities will permanently adversely affect the RNC. If the proposed project includes a wetland replacement plan under WCA, please contact your [DNR Regional Ecologist](#) for further evaluation. Please visit [WCA Program Guidance and Information](#) for additional information, including the [RNC Technical Guidance](#).

State-listed Species

- Several state-listed plant species have been documented within the vicinity of the proposed project; these are listed in the table below. As detailed above, the project overlaps with many areas of ecological significance which are more likely to contain habitat for state-protected species. Minnesota's Endangered Species Statute (*Minnesota Statutes*, section 84.0895) and associated Rules (*Minnesota Rules*, part 6212.1800 to 6212.2300 and 6134) prohibit the take of threatened or endangered species without a permit. **To demonstrate avoidance, a qualified surveyor will need to determine if suitable habitat exists within the activity impact area and, if so, conduct a survey prior to any project activities.** Except for montane yellow-eyed grass, these species are unlikely to occur in the currently maintained utility right-of-way but may have suitable habitat if the project impacts areas outside of that.

The goal of the habitat assessment is to identify potential locations where endangered (END) and threatened (THR) species may occur to help formulate an avoidance plan or to determine the need for a permit to take. Species of special concern (SPC) are also rare and an important component of Minnesota's natural heritage; we strongly encourage project alternatives that avoid or minimize impacts to these species as well.

Common Name	Scientific Name	MN Status	Habitat
Narrow Triangle Moonwort	<i>Botrychium angustisegmentum</i>	THR	Mesic Hardwood Forest
Goblin Fern	<i>Botrychium mormo</i>	THR	Mesic Hardwood Forest
Cuckoo Flower	<i>Cardamine pratensis</i>	THR	Forested Rich Peatland, Non-forested Rich Peatland
Lapland Buttercup	<i>Ranunculus lapponicus</i>	SPC	Forested Rich Peatland
Barren Strawberry	<i>Waldsteinia fragarioides</i>	SPC	Mesic Hardwood Forest, Fire Dependent Forest
Montane Yellow-eyed Grass	<i>Xyris montana</i>	SPC	Non-forested Rich Peatland, Non-forested Acid Peatland

Surveys must be conducted by a qualified surveyor and follow the standards contained in the [Rare Species Survey Process](#) and [Rare Plant Guidance](#). Visit the [Natural Heritage Review](#) page for a list of certified surveyors and more information on this process. Survey proposals should be submitted to Reports.NHIS@state.mn.us prior to initiating survey work. Project planning should take into account

that any botanical survey needs to be conducted during the appropriate time of the year, which may be limited. Please consult Review.NHIS@state.mn.us if you have any questions regarding this process.

- The American goshawk (*Accipiter atricapillus*), a state-listed bird species of special concern, has been documented in the vicinity of the proposed project. This species is found in large, older upland forests systems. They are impacted by fragmentation, loss of forest diversity, and decrease in mature trees. If there is any tree removal associated with the proposed project, we recommend trees be inspected for nests prior to being cut down between April 1 and August 15.
- Trumpeter swans (*Cygnus buccinator*), a state-listed species of special concern, have been documented nesting in the vicinity of the proposed project. During the breeding season, trumpeter swans select small ponds and lakes with extensive beds of cattails, bulrush, sedges, and/or horsetail. Ideal habitat includes about 100 m of open water for take-off, stable levels of unpolluted water, emergent vegetation, low levels of human disturbance, and the presence of muskrat (*Ondatra zibethicus*) houses and American beaver (*Castor canadensis*) lodges for use as nesting platforms. If any of the wetlands on site provide suitable habitat, swans may choose to nest in these wetlands. The DNR recommends avoiding construction activities during the nesting season, April 15 through June 15, near suitable nesting habitat.
- Pugnose shiner (*Miniellus anogenus*), state-listed as threatened, has been found in the Floodwood River near the proposed project. The pugnose shiner prefers clear, low velocity lakes and streams with an abundance of submerged vegetation such as eelgrass, Canadian elodea, pondweed, and muskgrass. This species is vulnerable to the removal of littoral vegetation from lakes, the invasion of Eurasian water milfoil (*Myriophyllum spicatum*), increases in eutrophication from nutrient enrichment, and increases in water turbidity. Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134) prohibit the take of threatened or endangered species without a permit. To protect spawning pugnose shiner, **work within the water, including crossing by vehicles, must be avoided from May 1 through July 31**. Consult with the NH Review Team (Review.NHIS@state.mn.us) if this is not feasible, as further action may be needed.
- Creek heelsplitter (*Lasmigona compressa*) and black sandshell (*Ligumia recta*), both state-listed mussel species of special concern, have been documented in the Swan, Cloquet, and St. Louis Rivers in the vicinity of the proposed project. Mussels are particularly vulnerable to deterioration in water quality, especially increased siltation. As such, effective erosion prevention and sediment control practices must be implemented and maintained near the river throughout the duration of the project and incorporated into any stormwater management plan.
- The Natural Heritage Information System (NHIS) tracks bat roost trees and hibernacula plus some acoustic data, but this information is not exhaustive. Even if there are no bat records listed nearby, all of Minnesota's bats, including the federally endangered northern long-eared bat (*Myotis septentrionalis*), can be found throughout Minnesota. During the active season (approximately April-November) bats roost underneath bark, in cavities, or in crevices of both live and dead trees. Tree removal can negatively impact bats by destroying roosting habitat, especially during the pup rearing season when females are

forming maternity roosting colonies and the pups cannot yet fly. To minimize these impacts, **the DNR recommends that tree removal be avoided from June 1 through August 15.**

- Please visit the [DNR Rare Species Guide](#) for more information on the habitat use of these species and recommended measures to avoid or minimize impacts.

Federally Protected Species

- To ensure compliance with federal law, conduct a federal regulatory review using the U.S. Fish and Wildlife Service's (USFWS) online [Information for Planning and Consultation \(IPaC\) tool](#).

Environmental Review and Permitting

- Please include a copy of this letter and the MCE-generated Final Project Report in any state or local license or permit application. Please note that measures to avoid or minimize disturbance to the above rare features may be included as restrictions or conditions in any required permits or licenses.

The Natural Heritage Information System (NHIS), a collection of databases that contains information about Minnesota's rare natural features, is maintained by the Division of Ecological and Water Resources, Department of Natural Resources. The NHIS is continually updated as new information becomes available and is the most complete source of data on Minnesota's native plant communities, rare species, and other rare features. However, the NHIS is not an exhaustive inventory and does not contain the locations of all rare features in the state. Therefore, ecologically significant features for which we have no records may exist within the project area. If additional information becomes available regarding rare features in the vicinity of the project, further review may be necessary.

For environmental review purposes, the results of this Natural Heritage Review are valid for one year; the results are only valid for the project location and project description provided with the request. **If project details change or the project has not occurred within one year, please resubmit the project for review within one year of initiating project activities.** Resubmit by selecting *Clone Project as Draft* on the project page in MCE.

The Natural Heritage Review does not constitute project approval by the Department of Natural Resources. Instead, it identifies issues regarding known occurrences of rare features and potential impacts to these rare features. Visit [Natural Heritage Review](#) for additional information regarding this process, survey guidance, and other related information. For information on the environmental review process or other natural resource concerns, please contact your [DNR Regional Environmental Assessment Ecologist](#).

Thank you for consulting on this matter and for your interest in preserving Minnesota's rare natural resources.

Sincerely,

James Drake

Natural Heritage Review Specialist

james.f.drake@state.mn.us

Cc: Jessica Parson, Samantha Bump