



Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road
St. Paul, MN 55155-4040

April 23, 2026

Emily Johnson
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Application of Minnesota Power and American Transmission Company, LLC for a Certificate of Need and Route Permit for the Iron Range – St. Louis County – Arrowhead 345 kV Transmission Project
PUC Docket Number: E015/CN-25-111; E015/TL-25-112

To Whom It May Concern,

The Minnesota Department of Natural Resources (DNR) has reviewed the route permit application for the Iron Range – St. Louis County – Arrowhead 345 kV High Voltage Transmission Line (HVTL) project (Project), proposed by Minnesota Power and American Transmission Company, LLC (Applicants). Our agency offers the following comments:

Rare Resource Impact Mitigation

Natural Heritage Review

The Minnesota Natural Heritage Information System (NHIS) has been reviewed to determine if the proposed project has the potential to impact any rare species or other significant natural features. Several state-listed species have been documented in the vicinity of the Project, and the mitigation measures are addressed in the Natural Heritage Review (MCE 2025-00541; attached). This includes, but is not limited to, the following:

State-listed Species

Plant Species

Multiple state-listed plant species have been documented in the vicinity of the project, and avoidance measures are required.

Fish Species

Pugnose shiners have been documented in the Floodwood River, in the vicinity of the project, and avoidance measures are required.

DNR recommends including a special permit condition, similar to TL-23-425:

Prior to the start of construction, the Permittee shall resubmit a Natural Heritage Review and continue to consult with the MDNR regarding implementation of avoidance measures for state-listed threatened and endangered species. The Permittee will comply with applicable Minnesota Department of Natural Resources requirements related to state-listed endangered and threatened species in accordance with Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, parts 6212.1800 to 6212.2300 and 6134). The Permittee shall keep records of compliance with this section and provide them upon the request of Commission staff.

MBS Sites of Biodiversity Significance and DNR Native Plant Communities

Several MBS Sites of Biodiversity Significance and DNR Native Plant Communities have been documented throughout the project and are adequately addressed in the permit application. We recommend addressing details regarding vegetation management in these sensitive areas in the Vegetation Management Plan (VMP).

The Natural Heritage Review letters are based on the Applicants' proposed route and are valid for one year. Any project changes, including routes, access roads, or staging areas, would require an updated review to ensure rare resources are identified, and any potential impacts are mitigated.

Avian Flight Diverters

Incorporating avian flight diverters into transmission line design minimizes the likelihood of bird collisions attributed to visibility issues. The DNR supports the draft permit condition requiring the Applicants to use avian flight diverters and to coordinate with the DNR to determine optimal placement after the route is finalized.

Vegetation Management

Vegetation Removal Timing

The DNR recommends including a special permit condition requiring the Applicants to clear vegetation for the Project from November 1 to April 1. Winter vegetation clearing minimizes impacts to a majority of nesting birds and bat species, including the federally endangered northern long-eared bat. This also minimizes the spread of invasive species, diseases such as Oak Wilt and Dutch Elm Disease, and minimizes impacts to the landscape.

Vegetation Management Plan

The DNR supports the permit condition requiring continued coordination with the Vegetation Management Plan Working Group to refine the Project's VMP. The DNR requests approval authority for seed mixes used on state lands, areas adjacent to state lands, and sensitive habitat areas with state-listed species. The VMP needs to specifically address the timing of vegetation removal, maintaining floodplain vegetation to the extent feasible, herbicide use, and minimizing impacts to sensitive areas, including but not limited to MBS Sites of Biodiversity Significance, DNR Native Plant Communities, and state-managed lands.

Floodplains and Riparian Zones

The DNR recommends the Applicants restore any disturbed floodplains and riparian zones to pre-construction profile and to revegetate these areas to the greatest extent feasible. Vegetation clearing within a floodplain, especially tree removal, can greatly destabilize the riverbank and surrounding area. If the riverbank is destabilized, erosion issues will likely contribute to sedimentation to the river, negatively impacting the water quality and the river ecosystem. This can also lead to pole stability issues and create long-term maintenance challenges. Given the increased rates of precipitation throughout the state, stabilizing floodplains and riparian zones has become even more imperative. The details of revegetation should be addressed in the VMP.

DNR Managed Areas

State Forests

The Project crosses the Riverlands State Forest. The DNR manages the trees, water, and wildlife in state forests to keep them healthy and meet recreational, environmental, and economic goals. This particular state forest provides multiple recreation opportunities such as camping, fishing, and hunting. As such, we recommend the Project minimizes impacts to the extent feasible by consolidating infrastructure and minimizing additional ROW.

Trout Streams

The Project crosses several designated trout streams and protected trout stream tributaries that support wild brook trout. Increased stream temperatures are one of the greatest threats to cold water trout streams. Maintaining sufficient canopy and vegetative shading is especially important to protect cold water trout streams. Any loss of shade, especially a maintained ROW, could have long-term impacts with the potential to affect many miles of water downstream.

In accordance with Minnesota Rules 6135.1100, subpart 4, item B, the DNR strongly recommends the Applicants avoid creating any new trout stream crossings by following existing ROW, as proposed. To ensure maximum efforts are taken to minimize damage to trout habitat, we request that the Applicants develop site-specific plans for each trout stream crossing in coordination with DNR staff.

Aquatic Management Areas

The Project is in the vicinity of Sand Creek, White Pine River, and Bruce Creek Aquatic Management Areas (AMAs). AMAs are designated to protect, develop, and manage lakes, rivers, streams, and adjacent wetlands and lands that are critical for fish and other aquatic life, for water quality, and for their intrinsic biological value, public fishing, or other compatible outdoor recreational uses. Given the importance of AMAs, we recommend the Project avoid these areas. If avoidance is not possible, we recommend the Project minimizes impacts to the extent feasible by consolidating infrastructure and minimizing additional ROW. We request that the Applicants develop site-specific plans for AMA crossings in coordination with DNR staff.

The DNR recommends including a special permit condition, similar to TL-22-611:

The Permittee must restore and revegetate floodplain habitat along the right-of-way to be affected by the construction of the Project to the greatest extent feasible. Restoration within the right-of-way near trout streams, their tributaries, and AMAs must be coordinated with the DNR to ensure that restoration in these areas provides adequate resource protection.

Peat and Aggregate Resources

The Project is in the vicinity of aggregate and peat resources on state-managed lands. It is important to note that terms included in future DNR licenses would include requirements that preserve access to minerals in case of future exploration and/or development. If peat or aggregate development were to occur within the Project area, any infrastructure would need to be moved/removed at the expense of the applicant.

Trails

State Water Trails

The Project will cross St. Louis River and Cloquet River which are designated State Water Trails. State water trails are designated for their historic, recreational, and scenic value (*Minnesota Statutes*, section 85.32). To maintain the recreational value of these rivers, vegetation removal along the river should be minimized to the extent feasible. The DNR supports the draft permit condition to minimize vegetation removal to the extent practicable to preserve the aesthetic conditions at this crossing.

State Trails

Cloquet-Saginaw State Trail (Saginaw Grade/Lumberjack OHV/ATV Trail). The DNR requests the Applicants coordinate with the DNR regarding any impacts, such as temporary closures, from Project construction.

Snowmobile Trails

The Project crosses multiple snowmobile trails. The DNR strongly encourages the applicants to coordinate with the snowmobile trail associations regarding any impacts, such as temporary closure or rerouting. The DNR greatly appreciates any effort by the Applicants to assist in finding alternative routes if trail impacts are unavoidable.

DNR Permitting

Crossing Public Waters and State Lands

The DNR oversees the administration of designated public waters and state lands, including WMAs, to ensure these resources are managed for the public's collective interest. A [Utility License Application](#) must be completed to obtain a license to cross these protected areas. The utility license to cross state lands review also determines deed, contract, funding, or other restrictions on state lands. Such restrictions could impact licensing and routing of the transmission line. Some DNR-administered lands have been purchased using funds that put restrictions on the lands. Before the DNR can grant a utility license over state lands with a funding restriction, our agency must receive written approval from the funding provider. The DNR will identify if and where there are funding restrictions on state lands. The funding provider review can take up to a year or more. Approval may or may not be granted by the funding provider.

Water Appropriation and Work in Public Waters

A DNR Water Appropriation Permit is required for all users withdrawing more than 10,000 gallons of water per day or 1 million gallons per year. A DNR Public Waters Work Permit is required for all projects involving development activities below the ordinary high water level in public waters and public waters wetlands. Both permits can be applied for in the [MNDNR Permitting and Reporting System \(MPARS\)](#).

The DNR appreciates the opportunity to comment on the construction and operation of the proposed Iron Range – St. Louis County – Arrowhead 345 kV HVTL Project. Please contact me if you have questions about our agency's comments.

Sincerely,

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Attachments: Natural Heritage Review

Equal Opportunity Employer