Appendix C

Agency and Public Correspondence

Appendix C-1

Minnesota State Historic Preservation Office Consultation

Minnesota Historical Society

Using the Power of History to Transform Lives
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STATE HISTORIC PRESERVATION OFFICE

November 4, 2013

Ms. Kari Krause
Senior Cultural Resources Analyst
Merjent, Inc.
800 Washington Avenue North, Suite 315
Minneapolis, MN 55401

RE: Minnesota Power; Laskin Energy Center Natural Gas Pipeline Project
Construct 1 mile of pipeline from the Laskin Energy Center in Hoyt Lakes to the Northern Natural Gas Company pipeline system
Saint Louis County
SHPO Number: 2014-0076

Dear Ms. Krause:

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

Based on our review of the project information, we conclude that there are **no properties** listed in the National or State Registers of Historic Places, and no known or suspected archaeological properties in the area that will be affected by this project.

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 permit or license, it should be submitted to our office by the responsible federal agency.

Please contact our Compliance Section at (651) 259-3455 if you have any questions regarding our review of this project.

Sincerely,

Sarah Beimers

Sarah Beimers, Manager
Government Programs and Compliance

merjent

p 612.746.3660 ▪ f 612.746.3679

800 Washington Avenue North ▪ Suite 315 ▪ Minneapolis, Minnesota ▪ 55401

October 7, 2013

Barbara Mitchell Howard
Deputy State Historic Preservation Officer
State Historic Preservation Office
Minnesota Historical Society
345 Kellogg Blvd. W.
St. Paul, MN 55102-1903

RE: Minnesota Power
Laskin Energy Center Natural Gas Pipeline Project
Cultural Resources Assessment and Recommendations - Request for SHPO Comment

Dear Ms. Mitchell Howard:

Minnesota Power is proposing to construct an approximate 5,900-foot-long, 11-inch-outside-diameter high pressure natural gas pipeline, called the Laskin Energy Center Natural Gas Pipeline Project (Project). The Project will allow for the conversion from coal-fired stations to natural gas-fired stations at the Laskin Energy Center. The project spans approximately one mile to the south from Minnesota Power's Laskin Energy Center in Hoyt Lakes, Minnesota to Northern Natural Gas Company's pipeline system, within T58W, R15N, Section 12 and T58W, R14N, Section 7 in St. Louis County, Minnesota.

The pipeline will originate from Northern Natural Gas Company's pipeline system and traverse approximately 5,900 feet in a northeasterly direction to its terminus at the Laskin Energy Center. The area the pipeline will be routed traverses a developed area with existing infrastructure, including road and transmission line rights-of-way. The preferred pipeline route is anticipated to be collocated with an existing high-voltage electric transmission line easement for much of its length.

Environmental review of the Project falls under the jurisdiction of the Public Utilities Commission (PUC). Specifically, the Minnesota PUC will review the Project for effects on archaeological and historical resources under Minnesota Statutes (MS) 138.31 – 138.42. Also, Minnesota state laws protect burials of all types (Minnesota Private Cemeteries Act [MS 307.08]), and archaeological and historic sites that are listed on the National Register of Historic Places (NRHP) or the State Register of Historic Places and the State Historic Sites Network (MS 138.661 – 138.669).

On behalf of Minnesota Power, Merjent, Inc. (Merjent) has completed a cultural resources background records review and assessment for the Project. The area of potential effect (APE) for direct impacts on cultural resources is the 150-foot-wide construction corridor for the proposed pipeline within a larger route corridor that ranged from 250 to 1,400 feet in width. It is our recommendation that there will be no adverse effects to known cultural resources or historic properties listed on, or eligible for listing on, the NRHP as a result of the proposed Project. No archaeological investigation or architectural inventory is recommended for the Laskin Energy

Center Project. The report detailing the findings of this cultural resources assessment is enclosed for your review.

On behalf of Minnesota Power, we respectfully request Minnesota SHPO review of the enclosed assessment and written concurrence with the findings and recommendations that the Project will not affect properties listed on, or eligible for listing on, the NRHP and that no cultural resources field inventory is required. If you have questions regarding this Project or require additional information, please contact me at (612) 643-5248 (email at kkrause@merjent.com), or Jim Atkinson of ALLETE, Inc. at (218) 355-3561. Merjent and Minnesota Power look forward to receiving your response to this request.

Sincerely,
Merjent, Inc.

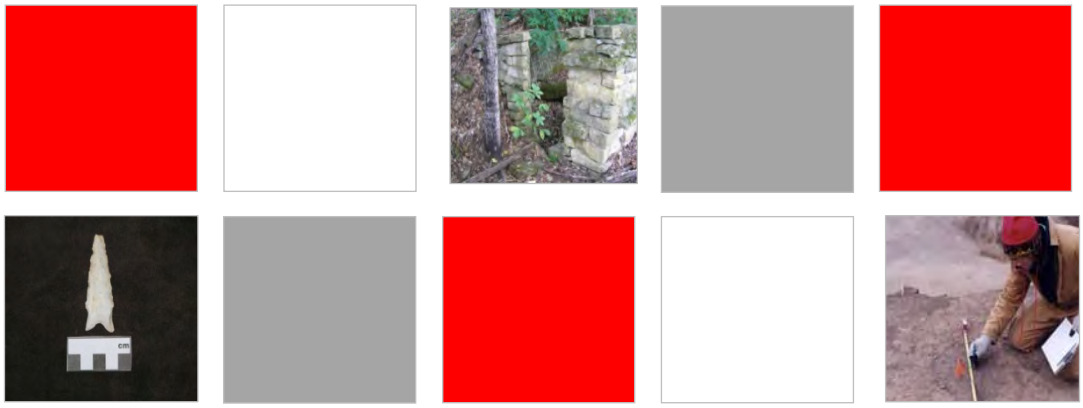
Kari Krause

Kari Krause, RPA

Senior Cultural Resources Analyst

Enclosure: Cultural Resources Assessment and Recommendations Report

cc: Jim Atkinson, ALLETE, Inc.



Cultural Resources Assessment and Recommendations for the Minnesota Power

Laskin Energy Center Natural Gas Pipeline Project

St. Louis County, Minnesota

October 2013

Report Title: Cultural Resources Assessment and Recommendations for the Minnesota Power Proposed Laskin Energy Center Project, St. Louis County, Minnesota

Report Prepared by: Merjent, Inc.
800 Washington Avenue North
Suite 315
Minneapolis, Minnesota 55401
612-746-3660

Report Author**:** Kari Krause, M.S., R.P.A.

Report Date: October 4, 2013

Submitted to: James Atkinson
Environmental Siting and Permitting
ALLETE, Inc. /Minnesota Power
30 West Superior Street
Duluth, Minnesota 55802

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INTRODUCTION

Project Description

Minnesota Power is proposing to construct an approximate 5,900-foot-long, 10.75-inch-outside-diameter high pressure natural gas pipeline, called the Laskin Energy Center Natural Gas Pipeline Project (Project). The Project will allow for the conversion from coal-fired stations to natural gas-fired stations at the Laskin Energy Center. The Project is located within T58W, R15N, Section 12 and T58W, R14N, Section 7 in St. Louis County, Minnesota, originating from Northern Natural Gas Company's pipeline system and traversing approximately 5,900 feet in a northeasterly direction to its terminus at the Laskin Energy Center **(Figure 1**).

As part of the environmental review for the proposed Project, Merjent, Inc. (Merjent) is assessing the potential Project impacts on cultural resources. This report presents the methods and findings of a cultural resources literature review for the project area. The primary goal of a literature review is to identify all known previously recorded archaeological sites and historic standing structures for a given location, as well as the previously completed site inventories. The additional goals are to define the cultural background and determine the potential for the presence of unrecorded cultural sites.

Kari Krause, MS, RPA of Merjent conducted the research and wrote the literature review report with the mapping support of Merjent's Geographic Information System department.

Jurisdiction

At this time, there are no federal regulatory triggers that would require compliance with federal historic preservation laws, notably Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Route review for the Project falls under the jurisdiction of the Minnesota Public Utilities Commission (PUC). Specifically, the Minnesota PUC will review the Project for effects on archaeological and historical resources under Minnesota Statutes (MS) 138.31 – 138.42. Also, Minnesota state laws protect burials of all types (Minnesota Private Cemeteries Act [MS 307.08]), and archaeological and historic sites that are listed on the National Register of Historic Places (NRHP) or the State Register of Historic Places and the State Historic Sites Network (MS 138.661 – 138.669). The NHPA and its enacting regulations have become standards for identifying cultural resources and evaluating their significance, and served as a general guide to researching and writing the literature review.

Project Location

The Project is situated northwest of Hoyt Lakes, within T58W, R15N, Section 12 and T58W, R14N, Section 7 in St. Louis County, Minnesota (see **Figure 1**). The Area of Potential Effect (APE) for direct impacts to cultural resources is the preferred pipeline construction right-of-way (i.e., 100-foot-wide typical pipeline construction workspace plus additional temporary workspace at select locations), which are located within a 161 acre "route" that would be covered under the Route Permit issued by the Minnesota PUC. Minnesota Rules, Chapter 7852.0100, Subpart 31, defines "route" as the proposed location of a pipeline between two end points. A route may have a variable width from the minimum required for the pipeline right-of-way up to 1.25 miles. Minnesota Power assessed a planning route

corridor ranging from 685 to 2,600 feet in width between the start of the proposed Project at the Northern Natural Gas Company's pipeline and its terminus at Minnesota Power's Laskin Energy Center in Hoyt Lakes. In this report, Merjent has analyzed and presented data for an approximate 685- to 2,600-foot-wide route corridor, with a primary focus on the preferred pipeline construction right-of-way (see **Figure 1**).

The Project area is characterized by coniferous vegetation in a landscape of deep lakes and glacial deposits that has been previously disturbed by utility lines and transportation infrastructure. As previously stated, the pipeline will originate from Northern Natural Gas Company's pipeline system and traverse approximately 5,900 feet in a northeasterly direction to its terminus at the Laskin Energy Center. It will tie in to the existing Northern Natural Gas Company pipeline to the south. The proposed pipeline is anticipated to be placed adjacent to an existing transmission line easement for much of its length.

Environmental Setting

The proposed Project is located in northeastern Minnesota, near the City of Hoyt Lakes in St. Louis County. The climate of the project area is characteristic of the North American mid-continent, that is, subject to temperature extremes in winter and summer. The Project location is situated along the Laurentian or Northern Divide which demarks the change in the direction of stream flow to different oceans (Nationalatlas.gov). The area it is characterized by deep lakes, exposed bedrock and glacial outwash deposits. The terrain along the preferred route has moderate relief owing to the hummocky topography that typifies end moraine deposits (Hobbs and Goebel, 1982). Prior to Euro-American settlement, the vegetation was predominantly coniferous forest surrounding nearby lakes.

Known for its natural beauty, the Project location is located on private land within the Superior National Forest immediately south of the Mesabi Range and west of Colby Lake. Natural resources abound within this mix of environments including resources that can be used for food, shelter, and tools. The Project is situated in an upland setting with small, isolated wetlands within the study area. These wetlands have an emergent plant community of cattail, woolgrass, and Canada blue joint. Common tree and plant species in central St. Louis County include, but are not limited to, various species of firs, pines, maples, birch, willow, basswood, ash, juneberry, sedge, honeysuckle, pondweed, goldenrod, aster, and rush (Minnesota DNR 2012).

Cultural Resources Study Area Background

The earliest occupants of the region were Late Paleo-Indians (10,000-6,000 B.C.), known mostly through chance discovery of their large lithic tools and weapons. Occupation by Archaic period groups followed (8,000-500 B.C.), recognized by their technically improved lithic tools and exploitation of more diverse resources. The bow and arrow and pottery were widely used by the Woodland period (500 B.C.-1500 A.D.) which co-existed with the Mississippian/Oneota (900-1500 A.D.) who developed distinctive tribal customs and practices while expressing their beliefs through decorative material culture. Prehistorically, the region was a favored location for the Late Woodland period groups. They lived near waterbodies and utilized the many associated resources such as lake rushes and water lilies, wild rice, fish, and waterfowl.

When the first Europeans came to the region to trade for animal pelts (Contact period, 1650-1820), they encountered the Dakota Indians. The Ojibwe migrated to Minnesota in the early 1700s, displacing the Dakota to southern and western territories. The Assiniboine may also have been present in the region prior to the appearance of European explorers. The Native Americans tended to settle near forests and sheltered river valleys in the winter. They were hunters and fishers, focusing on big and small game, water fowl, fish, and harvesting wild rice.

In 1849 the Minnesota Territory was carved out of the remaining lands from the Iowa and Wisconsin Territories and later became a separate state in 1858. St. Louis County was established in 1855 but went through a series of name changes including Doty, Newton, and Lake. Modern-day St. Louis County was formed from parts of Carlton and Pine Counties in 1856. Today, St. Louis County has a diverse economic base including taconite mining, pulpwood production, recreation, service industry businesses, and one of the largest fresh water shipping ports at Duluth.

Early mining activities in the project area were conducted by the Erie Mining Company (Erie) which was, at the time, jointly owned by Bethlehem Steel, Youngstown Sheet and Tube, Interlake Iron and Stelco (Steel Company of Canada) (Lamppa 2004). Preliminary taconite mining operations in the Mesabi Range began in 1948. With all processing kept at the mining site, Erie began construction of a $300 million taconite processing plant and Taconite Harbor power plant in 1954. The Erie processing plant had a 7.5 million ton capacity and was serviced by a 73-mile-long railroad to Taconite Harbor, a loading dock located on Lake Superior (Harvard 2012; Lamppa 2004.)

The operation of the mine and plant led to the establishment of the town of Hoyt Lakes which was named after Elton Hoyt II, head of Pickands, Mather and Company, operators of the Erie Mining Company. The town was entirely platted prior to construction of homes. Residential construction began in May 1954, and by the end of the year, 100 of the constructed homes were occupied. The village was incorporated in 1955 and village officers were elected that December. The population expanded to 3,400 once the mine and plant came into full production in 1957 (Lamppa 2004.)

Two railroads serviced the project area. The Duluth, Missabe and Northern (DM&N) Railway was organized in 1891 by the Merritt brothers to transport iron ore from the Mountain Iron region to Duluth. The Duluth and Iron Range (D&IR) Railroad was formed in 1882 by the Towers family to ship ore from the Vermilion Range to Two Harbors. By 1910, Western Mesaba Branch extended operations to the Hoyt Lakes region. In 1901 the United States Steel Company acquired ownership of both railroads. In 1930, the DM&N Railway leased the D&IR, and in 1937, the two railroads were consolidated to form the Duluth, Missabe and Iron Range (DM&IR) Railway (LakenWoods.com).

METHODS

In order to study the cultural background and better understand the potential for impacts on cultural resources for the Project APE (i.e., defined as the construction right-of-way, additional temporary workspace, and the larger proposed PUC-permitted route corridor), a one-mile radius around the APE was used to gather information. The APE plus the one-mile buffer is defined as the cultural resources study area (or study area). Within this report, phrases such as “project area” or “project location” refer

to the general geographical location of the Project, not the specific APE or study area. **Table 1** provides the legal township, range and sections designations for the cultural resources study area. **Figure 1** shows the study area and the results of the literature review.

Table 1. Legal Description of Project Cultural Resources Study Area

Township	Range	Sections	County
T58N	R14W	5, 6, 7, 8, 17, 18	St. Louis
T58N	R15W	1, 11, 12, 13, 14	St. Louis

The main objective in reviewing the cultural resources literature is to identify the recorded cultural sites and assess the potential for unrecorded sites within the study area. The standard for considering a cultural property significant is whether it meets the criteria for listing on the NRHP. The initial criterion for such listing is an age of 50 or more years. Beyond age, a property must retain integrity and be associated with significant historic trends, historic persons, building styles and craftsmanship, or the property must have the potential to provide significant information about the past (National Park Service 1995).

Merjent reviewed and followed the published guidelines for conducting cultural resources literature reviews in Minnesota (Anfinson 2011). The Minnesota State Historic Preservation Office (SHPO), located in the Minnesota History Center in St. Paul, is the record keeper for the state's prehistoric and historic archaeological site files, historic standing structure inventory files, and field survey reports. The Office of the State Archaeologist (OSA), located at Fort Snelling History Center in St. Paul, maintains the records for burial sites within the State. Merjent requested a SHPO file search of their database by email, and after receiving the results, reviewed the files for information on the Project study area.

Ms. Krause examined the current topographic and aerial photo-based maps to understand the modern land use of the study area and to provide a baseline for examining the historic maps and documents. Several online resources were used to gather information. Ms. Krause looked up general information online about St. Louis County and the City of Hoyt Lakes. She also examined primary sources that have been digitized and made available online, such as the original land survey maps, original land patent records, historic aerial photos, topographic quadrangles, and plat maps.

Many cities in Minnesota have established a Certified Local Government (CLG) that is charged with creating policies that promote historic preservation. CLGs may have policies regarding historic preservation for construction on new or existing structures, and may conduct property inventories. No CLGs have been established in the project area. The nearest active historical society is located in Virginia, Minnesota, while the Minnesota Museum of Mining in Chisholm, Minnesota gathers and preserves historical items and provides educational programming about the iron mining industry in the State.

LITERATURE REVIEW RESULTS

National Register of Historic Places/Minnesota Historic Sites

A search of the National Register of Historic Places (NRHP) website and the records on file at the Minnesota SHPO did not identify any historic properties within the study area.

Minnesota State Site Files

Previously Recorded Archaeological Sites and Cemeteries

The background records review conducted at the SHPO identified one previously recorded archaeological site and no unmarked prehistoric or historic burials recorded at the OSA in the study area. Prehistoric mounds are not known in the immediate area, although there are mounds in other parts of St. Louis County (personal communication, Koenen 2013). Site 21SL843 is located 0.3-mile northwest of the Project APE, and is characterized as a lithic artifact scatter. Identified in 1999, the site was recommended potentially eligible for the NRHP. It will not be affected by the Project.

Previously Recorded Standing Structures

A total of four historic above-ground structures have been recorded within the study area that meets the initial criteria of being at least 50 years old (**Table 2**). Very little information is available for these historic above-ground structures at the Minnesota SHPO as all are missing copies of the record forms and locational information. None of these recorded historic structures appear to be located within the project area, nor have they been assessed for eligibility to the NRHP.

Table 2. Previously Recorded Standing Structures in the Project's Cultural Resources Study Area.

Inventory Number	Property Name	Address	Township/Range/ Section	NRHP Status
SL-HLC-063	DM & IR Main Line		T28N R14W S6	Not assessed
SL-HLC-011	D & IR Main Line Segment		T28N R14W S6	Not assessed
SL-UOG-083	Bath house	West of Hoyt Lakes on Colby Lake	T28N R14W S7	Not assessed
SL-HLC-009	Evergreen Trailer Park		T28N R14W S31	Not assessed

It is unlikely that the historic character or the landscape and surroundings will be affected by construction of the pipeline, especially because the APE is adjacent to an existing powerline and pipeline corridor.

Previously Conducted Cultural Resources Surveys

A single archaeological inventory and one sensitivity model has been completed within the study area; no archaeological surveys have been conducted along the Project route. Mulholland et al. (1999) completed a Phase I survey of approximately 38 acres for a proposed ash pond associated with the Laskin Energy Center northwest of the Project APE. They recorded one prehistoric artifact scatter (site 21SL843) that was recommended potentially eligible for the NRHP and recommended that it be avoided; neither the site nor the survey area is located within the Project APE. In 2005, 106 Group, Ltd completed an archaeological review and assessment of a proposed power line corridor and two new plants as part of proposed Mesaba Energy upgrades (Bielakowski and Stark 2005). They evaluated approximately 30,471 acres for archaeological sensitivity. While no surveys were conducted, the route evaluated included the current Project APE (**Figure 2**). Within the APE, high sensitivity areas were identified along the northern shoreline of Whitewater Lake, western shoreline of Colby Lake, and the peninsula where the Laskin Energy Center power plant is located.

Other Resources

Other historical documents relevant to the study area were reviewed in order to identify possible unrecorded historic sites that might be affected by the Project.

General Land Office Survey Maps

The General Land Office (GLO) Survey maps, representing the original township surveying of St. Louis County in 1879, were viewed online through the U.S. Department of the Interior, Bureau of Land Management (2013) website. The GLO map identifies the boundaries of Colby and Whitewater Lake, originally called Partridge Lake. No trails, roads, or settlements are depicted on this early map.

Historic Plat Maps

Historic plat maps were reviewed online at Historic Map Works, LLC. Residential Genealogy ™ to determine if any historic features such as early trails, homesteads, or settlements were recorded in the Project APE or study area. Plat maps dating in range from 1910 to 1976 provide a distinctive picture of how the area evolved over the decades. In 1910 it was a sparsely populated and rugged area with the Western Mesaba Branch of the D&IR Railroad the only transportation route (Historic Map Works 2013a). In another four years the area was owned by a single individual and in 1976 it was owned by Minnesota Power and Light and the Erie Mining Company (Historic Map Works 2013b, 2013c).

Historic Aerial Photographs

Merjent also compared historic and modern aerial photographs to better define the development of the utilities, transportation, and settlements of the study area between 1940 and 2011 (Minnesota Department of Natural Resources [MDNR] 2013). In 1940 and 1948 the APE is heavily wooded and there is one cleared road south of the APE that roughly follows modern day Highway 110 (**Figures 3 and 4**). The effects of the opening of the Erie Mining Company and the settlement of Hoyt Lakes in the 1950s are clearly evident in the 1961 aerial (**Figure 5**). The area is crisscrossed by multiple utility lines and

Colby Lake Road which leads to the Laskin Energy Center. Over the next 20 years these utility corridors progressively increased in width leaving isolated wooded plots (**Figure 6).** However, the 2011 aerial depicts the loss of these undisturbed areas due to the development of the energy infrastructure (**Figure 7**).

RECOMMENDATIONS

Merjent understands that the Project is under the jurisdiction of the Minnesota PUC and applicable state and local laws. Merjent is making recommendations according to standard predictability models for discovery of archaeological resources in the Upper Midwest, and in accordance with the relevant PUC regulations, the Minnesota Field Archaeology Act, the Minnesota Historic Sites Act, and the Minnesota Private Cemeteries Act. If there is federal involvement in the Project, such as federal permitting, licensing, or funding, the Project should comply with Section 106 of the National Historic Preservation Act of 1966, as amended.

The proposed pipeline will affect up to a 100-foot-wide right-of-way and additional temporary workspaces located within the proposed PUC-permitted route corridor. The preferred pipeline alignment traverses a developed area parallel to existing infrastructure, consisting of road and high-voltage transmission line rights-of-way. The Project will share these existing transportation corridors the greatest extent possible. The construction associated with these existing corridors within the proposed Project APE inhibits the potential for discovering any intact archaeological deposits.

While there are four historic buildings within the study area, none are located within the Project APE. Since the proposed project area will be installed below grade and adjacent to an existing utility corridor, it is unlikely to affect the view shed of any historic buildings. Merjent proposes a recommendation of no adverse effect to historic standing structures.

The sensitivity model developed by Bielakowski and Stark (2005) determined that the 20 percent, or 32.1 acres, of the Project APE has a high probability for archaeological sites. However, historic aerials indicate the historic landscape and surroundings of these high probability areas have been compromised due to the dynamic changes of increased infrastructure over the decades (see **Figures 4 and 7**). Indeed, the majority of the Project APE has been impacted by construction of utility and transportation corridors, and in recent times, additional commercial buildings at the southern end.

The preferred natural gas pipeline alignment was selected to maximize the use of existing rights-of-way. The majority of the preferred route parallels Minnesota Power's high voltage power line rights-of-way. The remaining APE crosses sparsely vegetated upland. Construction of the pipeline is not expected to have any direct effect on the cultural, historic or aesthetic values of the area. No significant changes in the vegetation, wildlife, wetlands, water quality, geology or soils are expected to result from the Project. The area presently has several existing natural gas and crude oil pipelines, and high voltage power lines. Installation of the pipeline will not significantly change land use patterns. Consequentially, the cumulative potential effect of the Project is expected to be minimal. It is our recommendation that no unknown archaeological sites or unrecorded historic structures will be adversely affected by the proposed construction of the Project. No archaeological field investigation or architectural inventory is recommended for either the preferred pipeline corridor or the proposed route corridor.

REFERENCES

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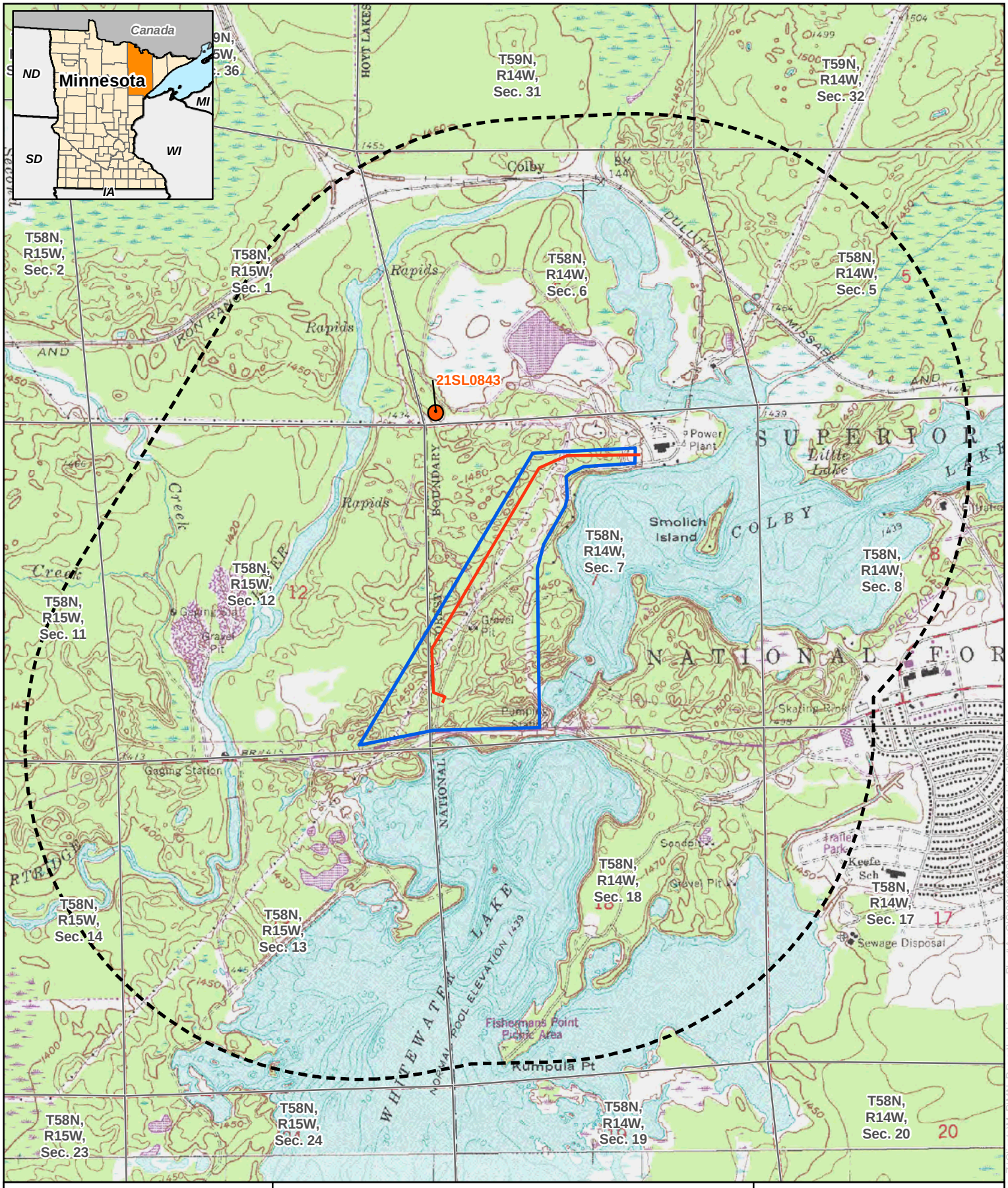
FIGURES



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1 inch = 2,000 feet

N W E S

Figure 1
Laskin Power Plant
St. Louis County, Minnesota

- Archaeological Site
- Proposed Centerline
- Project Area
- One Mile Buffer
- Section Boundary

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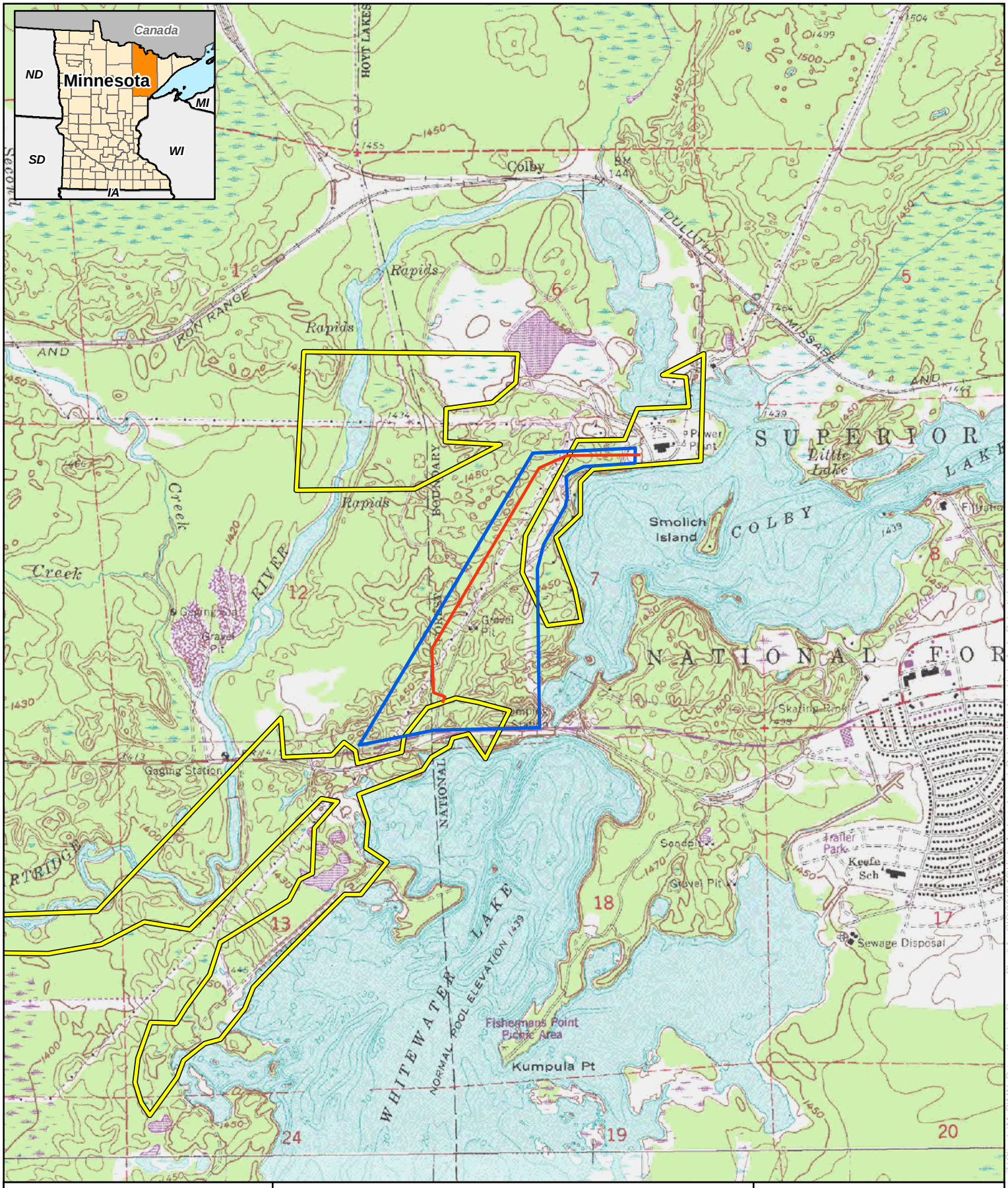
Date: (10/4/2013)



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1 inch = 2,000 feet

N W E S

Figure 2
Laskin Power Plant
Archaelogical Potential
St. Louis County, Minnesota

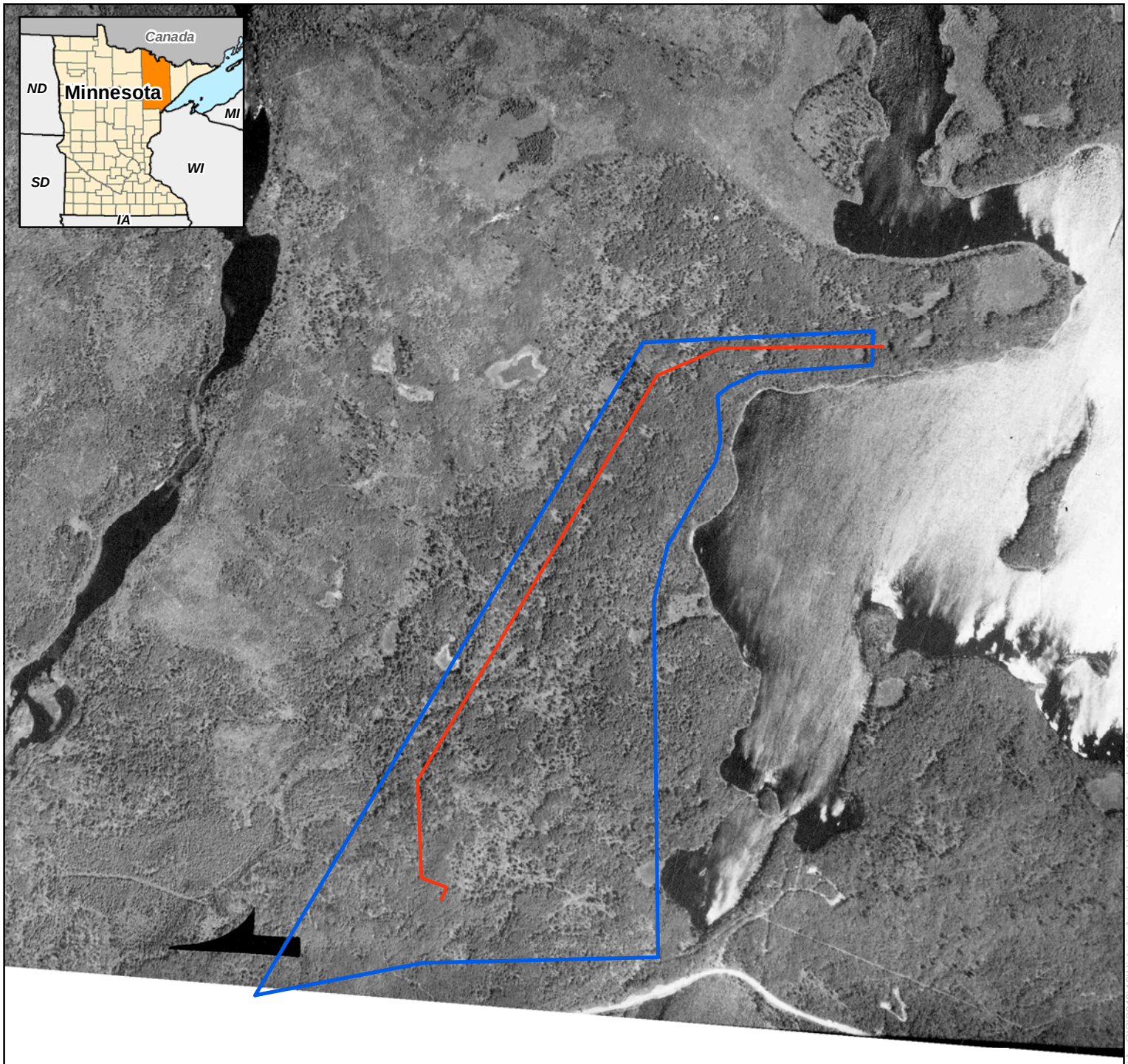
Proposed Centerline

Project Area

High Archaeological Potential (Bielakowski and Stark 2005)

Source: Z:\Clients\W_P\MN_Power\Laskin_Power_Plant\ArcGIS\2015\10\High_Archaeological_Potential\Laskin_High_Arch_Potential.mxd

Date: (10/4/2015)



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Minnesota Department of Natural Resources 500 Lafayette Road
St. Paul, MN 55155-4046

0 500 1,000 Feet

N W E S

1 inch = 1,000 feet

Figure 3
Laskin Pipeline Project
Historic Aerial Photographic Coverage - 1940
St. Louis County, Minnesota

Proposed Centerline

Project Area

Source: Z:\Clients\M_P\MN_Power\Laskin_Power_Plant\ArcGIS\2013\10\Historic_Aerials\Laskin_Historic_Aerials_1940.mxd

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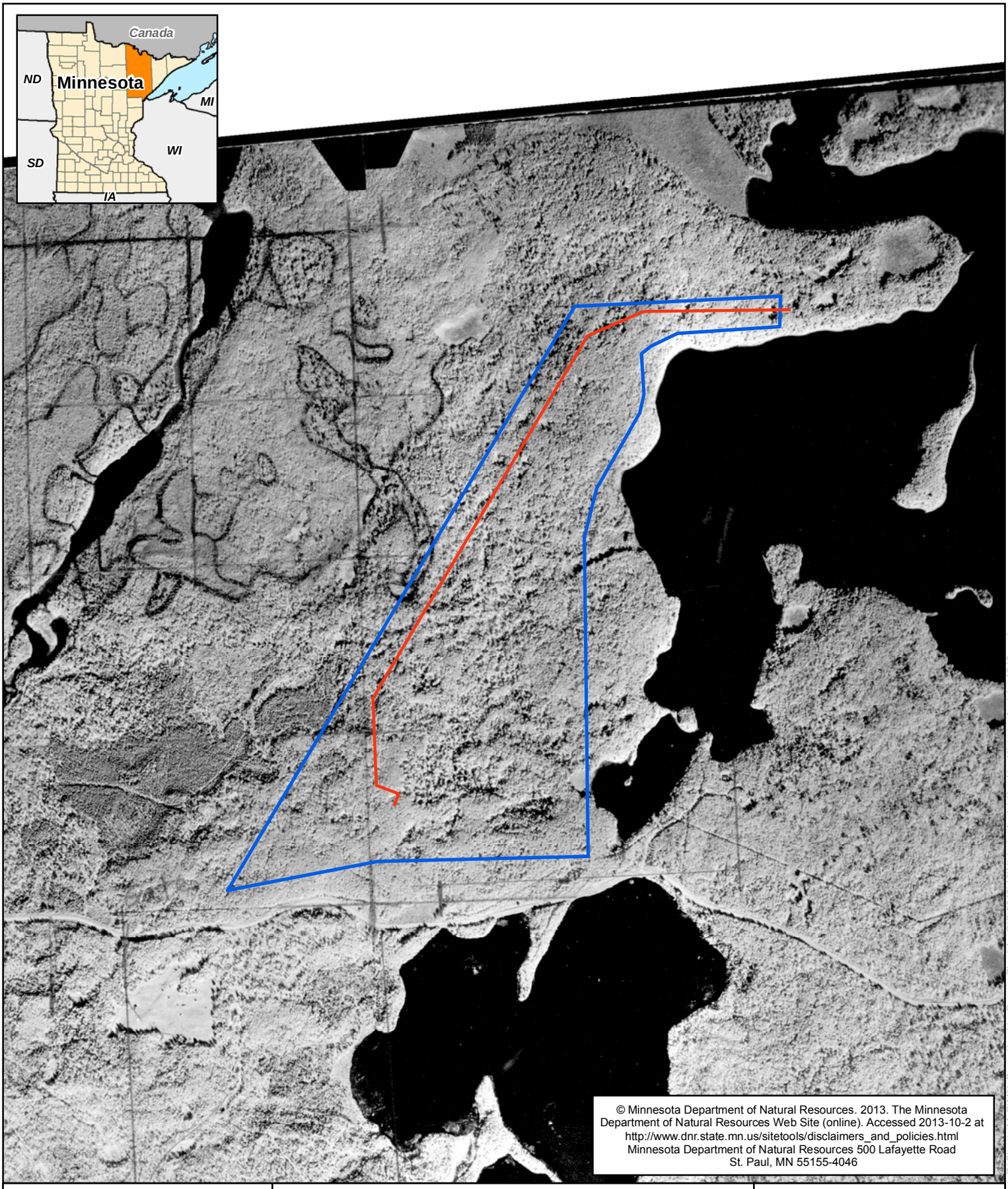

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N W E S

1 inch = 1,000 feet

Figure 4
Laskin Pipeline Project
Historic Aerial Photographic Coverage - 1948
St. Louis County, Minnesota

Proposed Centerline

Project Area

Source: Z:\Clients\W_P\MN_Power\Laskin_Power_Plant\ArcGIS\2013\10\Historic_Aerials\Laskin_Historic_Aerials_1948.mxd

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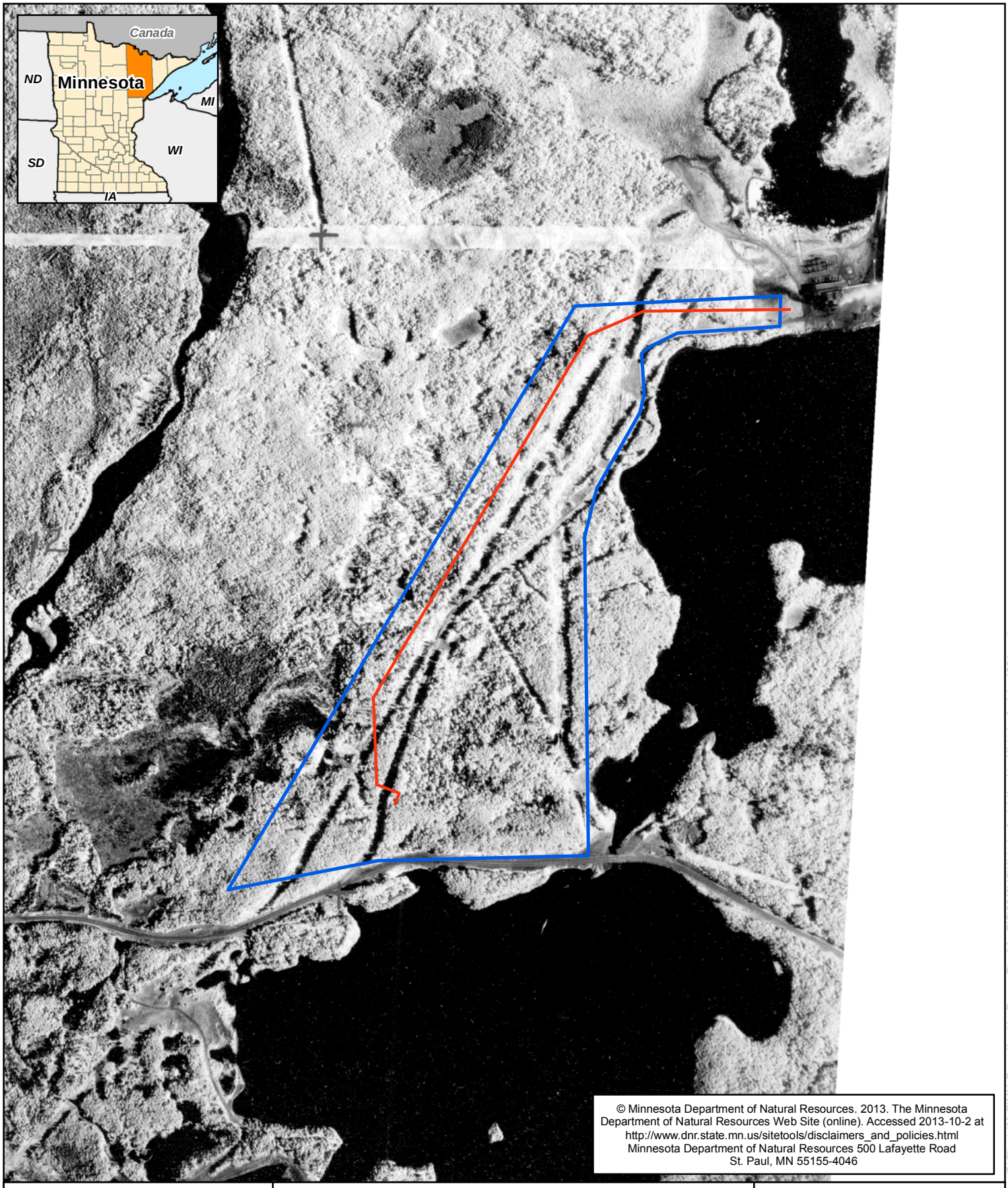

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0 500 1,000 Feet

1 inch = 1,000 feet

N W E S

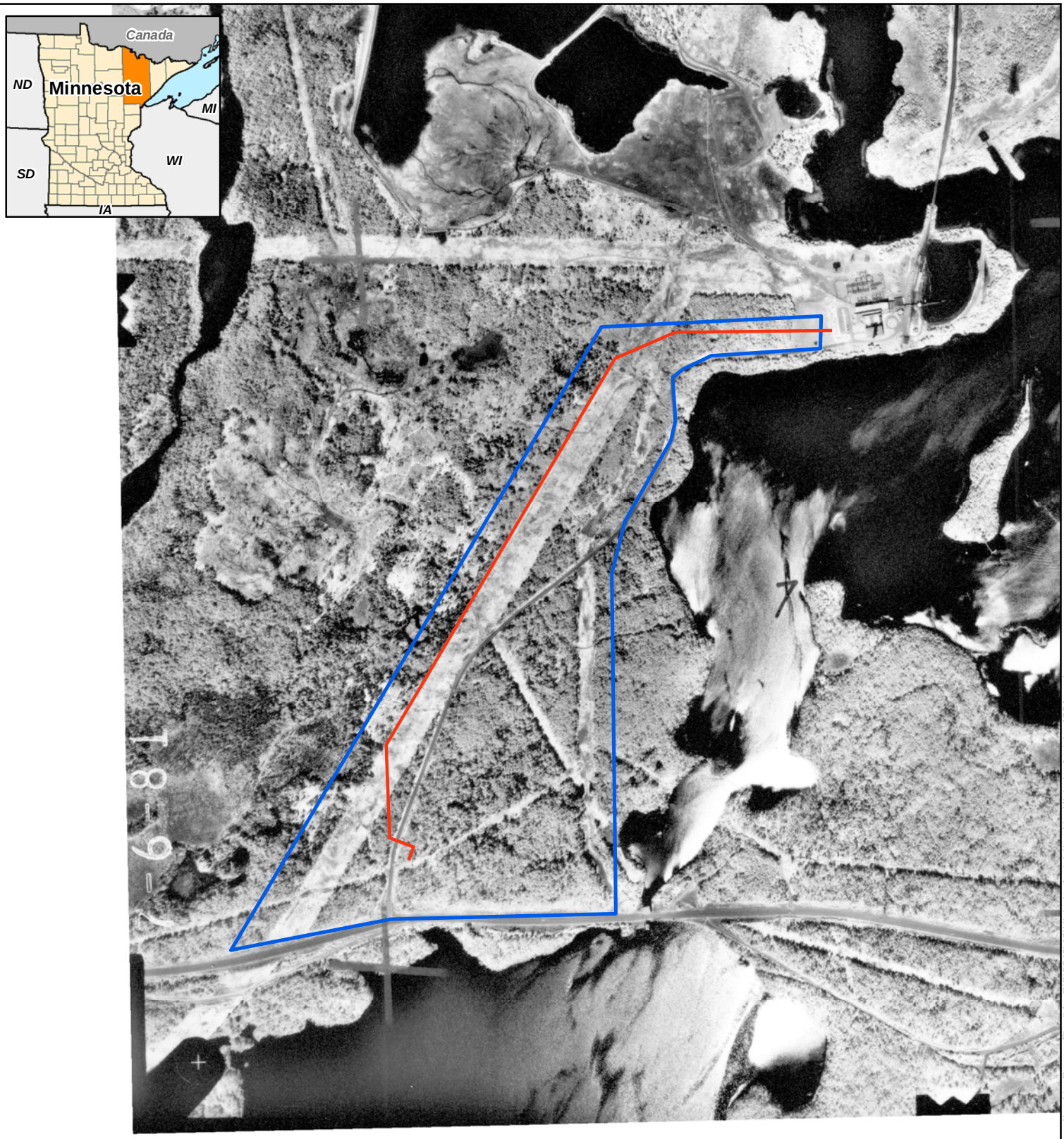
Figure 5
Laskin Pipeline Project
Historic Aerial Photographic Coverage - 1961
St. Louis County, Minnesota

Proposed Centerline

Project Area

Source: Z:\Clients\M_P\MN_Power\Laskin_Power_Plant\ArcGIS\2013\10\Historic_Aerials\Laskin_Historic_Aerials_1961.mxd

Date: (10/4/2013)



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Minnesota Department of Natural Resources 500 Lafayette Road
St. Paul, MN 55155-4046

0 500 1,000 Feet

N W E S

1 inch = 1,000 feet

Figure 6
Laskin Pipeline Project
Historic Aerial Photographic Coverage - 1981
St. Louis County, Minnesota

Proposed Centerline

Project Area

Source: Z:\Clients\M_P\MN_Power\Laskin_Power_Plant\ArcGIS\2013\10\Historic_Aerials\Laskin_Historic_Aerials_1981.mxd

Date: (10/4/2013)

0 500 1,000 Feet

1 inch = 1,000 feet

N W E S

Figure 7
Laskin Pipeline Project
Aerial Photographic Coverage - 2011
St. Louis County, Minnesota

Proposed Centerline

Project Area

Source: Z:\Clients\M_P\MN_Power\Laskin_Power_Plant\ArcGIS\2013\10\Historic_Aerials\Laskin_Aerials_2011.mxd

Date: (10/4/2013)

Appendix C-2

U.S. Fish and Wildlife Service Consultation

merjent

p 612.746.3660 ▪ f 612.746.3679

800 Washington Avenue North ▪ Suite 315 ▪ Minneapolis, Minnesota ▪ 55401

October 3, 2013

Tony Sullins, Field Supervisor
U.S. Fish and Wildlife Service
Twin Cities Field Office
4101 E. 80th Street
Bloomington, MN 55425-1665

Subject: Minnesota Power
Laskin Pipeline Project
Federally Listed Species Review

Dear Mr. Sullins:

Minnesota Power is proposing to construct an approximate 5,600-foot-long, 12-inch-outside-diameter, high pressure natural gas pipeline (Project) from Minnesota Power's Laskin Energy Center in Hoyt Lakes, MN to the Northern Natural Gas pipeline, located approximately one mile to the south, to allow for the conversion of coal-fired stations into natural gas-fired stations. Minnesota Power proposes to locate the Project within T58W, R15N, Section 12 and T58W, R14N, Section 7 in St. Louis County, Minnesota (see attached Project Location Maps). Construction of the Project is currently scheduled to begin in August 2014, or as soon as all required permits and approvals are obtained.

Minnesota Power has contracted with Merjent, Inc. (Merjent) to assist with the environmental review and permitting of the project, including protected species consultations and field surveys. Merjent identified the following federally listed species known to occur in St. Louis County[1]. No critical habitat was identified within the project area. Each species is further discussed below.

Species	**Status**	**Habitat**
Canada lynx (*Lynx canadensis*)	Threatened Critical Habitat	Northern forest
Piping Plover - Great Lakes population (*Charadrius melodus*)	Endangered	Sandy beaches, bare alluvial and dredge spoil islands

<u>Canada Lynx (*Lynx canadensis*)</u>

The Canada lynx is a medium-size cat that generally inhabits moist boreal forest that have cold, snowy winters and a high-density snowshoe hare prey base. The predominant vegetation of boreal forest is conifer trees, primarily species of spruce (*Picea* spp.) and fir (*Abies* spp.). In the contiguous United States, the boreal forest type transitions to deciduous temperate forest in the Northeast and Great Lakes, and to subalpine forest in the west. Individual lynx maintain large home ranges generally between 12 to 83 square miles. Noise and/or physical disturbance would prompt lynx to vacate the

[1] http://www.fws.gov/midwest/endangered/lists/minnesot-cty.html

area for a short period of time. Project effects would be minor and temporary. Since the lynx is a mobile species we anticipate any lynx would merely move away from the local area of disturbance, and could begin using the area shortly after cessation of activities. Lynx movement may be temporarily impeded and individuals may be displaced, but the impact on the lynx population would be minimal. Den sites are likely to be located around downed logs and windfalls within the forest interior away from the cleared pipeline corridor. Any changes in plant communities along the maintained corridor that may affect prey populations would also be temporary, as the right-of-way would return to pre-activity conditions. Furthermore, a review of the Minnesota Natural Heritage Information System (NHIS) data did not identify any occurrences of Canada lynx within one mile of the project area. Therefore, Minnesota Power believes the Project is *not likely to adversely affect* the Canada lynx.

Piping Plover (*Charadrius melodus*)

The Great Lakes population of piping plovers utilizes the open, sandy beaches, barrier islands, and sand spits formed along the perimeter of the Great Lakes. They do not inhabit lakeshore areas where high bluffs formed by severe erosion have replaced beach habitat. They prefer sparsely vegetated open sand, gravel, or cobble for their nesting sites. Many of the coastal beaches traditionally used by piping plovers for nesting have been lost to commercial, residential, and recreational developments.[2] The Project is over 40 miles from the Lake Superior shoreline and the habitat within the Project area is comprised of an industrial facility area, and herbaceous utility corridors with sparse forestland adjacent. Furthermore, review of the Minnesota NHIS data did not identify any occurrences of piping plover within one mile of the Project area. As a result, Minnesota Power believes the Project will have *no effect* on the piping plover. Minnesota Power understands that the U.S. Fish and Wildlife Service will not provide concurrence for a *no effect* determination, but instead is providing this review as documentation.

Minnesota Power respectfully requests your review and concurrence with its preliminary evaluation of federally listed species and habitats in the project area. If you have any questions or need further information, please contact me at (612) 746-3664 or tjanssen@merjent.com or James Atkinson of Minnesota Power at (218) 355-3561 or jbatkinson@allete.com. Thank you for your assistance.

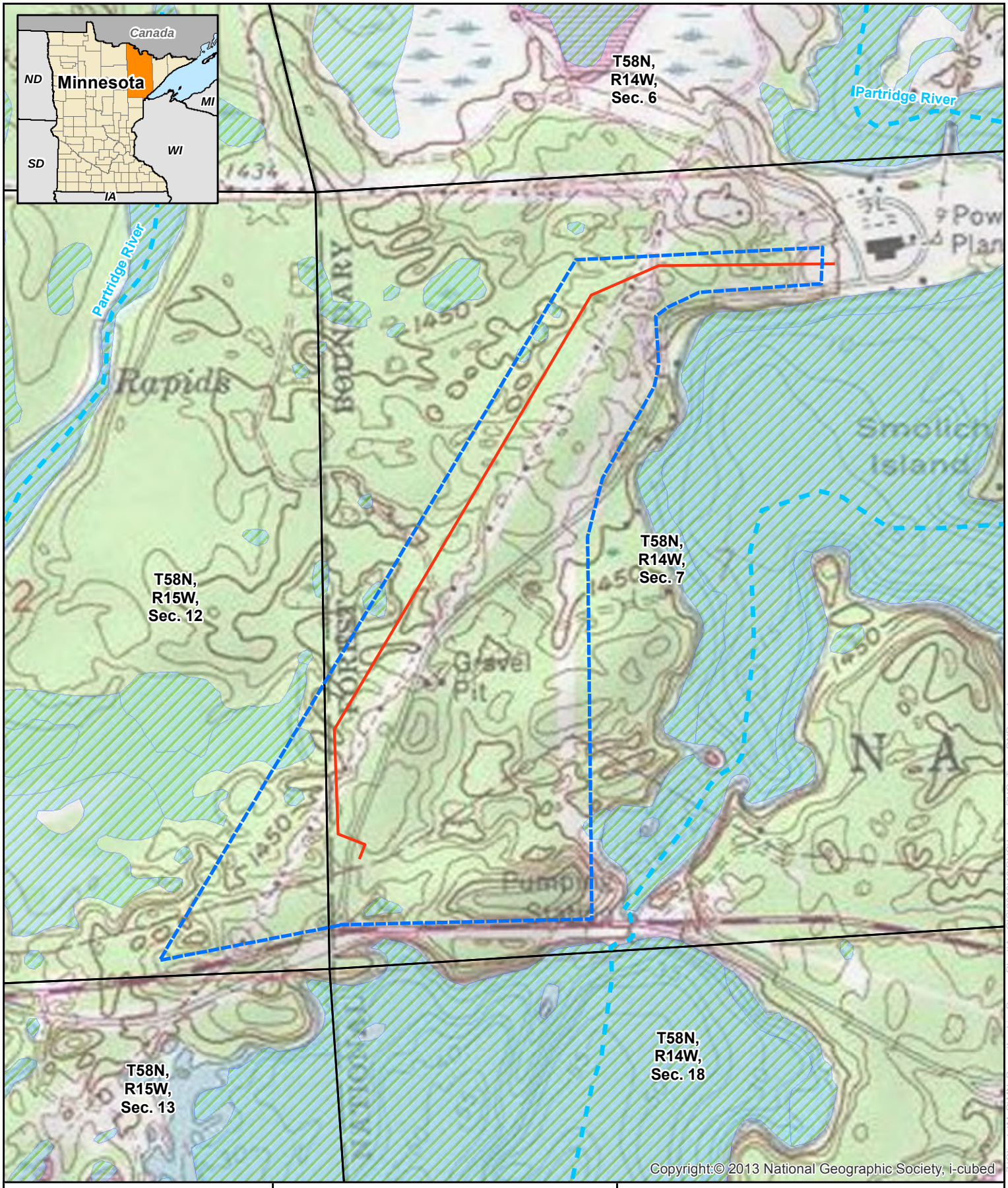
Sincerely,

Thomas Janssen
Merjent, Inc.

cc: James Atkinson, Minnesota Power

Enclosures: Project Location Maps

[2] http://ecos.fws.gov/docs/life_histories/B079.html



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N W E S

Minnesota Power

Laskin Pipeline Project

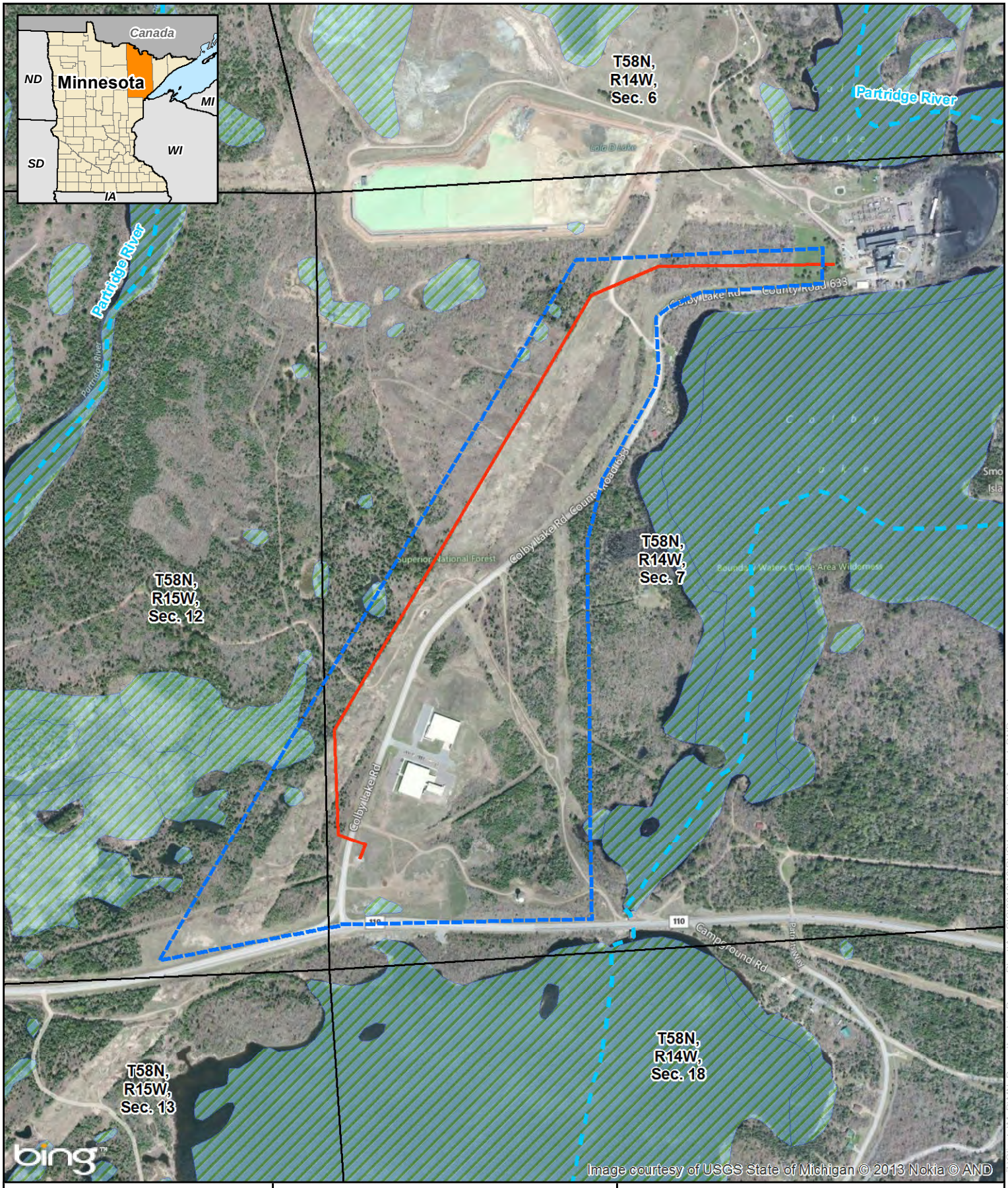
St. Louis County, Minnesota

Project Location – Topographic Map

- Proposed Centerline
- Waterbody
- Project Evaluation Area
- NWI Wetland
- Section, Township, Range Boundary

Source: Z:\Clients\M_P\MN_Power\Laskin_Power_Plant\ArcGIS\2013\10\PUC\Laskin_PUC_Topo_DNR.mxd

Date: (10/2/2013)



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N W E S

Minnesota Power
Laskin Pipeline Project
St. Louis County, Minnesota
Project Location – Aerial Map

- Proposed Centerline
- Waterbody
- Project Evaluation Area
- NWI Wetland
- Section, Township, Range Boundary

Source: Z:\Clients\M_P\MN_Power\Laskin_Power_Plant\ArcGIS\2013\10\PUC\Laskin_PUC_Aerial_DNR.mxd

Date: (10/2/2013)

Appendix C-3

Minnesota Department of Natural Resources National Heritage Information System Consultation

From: Angie Durand
Sent: Wednesday, October 02, 2013 2:51 PM
To: Joyal, Lisa (DNR) (Lisa.Joyal@state.mn.us)
Cc: 'Jim Atkinson (ALLETE)'; 'Benjamin T. Frings (bfrings@LSConsulting.com)'; tjanssen@merjent.com; Naomi K. Christenson
Subject: Minnesota Power - Laskin Pipeline Project - State-listed Species Review
Attachments: Laskin_Maps_DNR.pdf

Lisa,

Minnesota Power is proposing to construct an approximate 5,600-foot-long, 12-inch-outside-diameter, high pressure natural gas pipeline (Project) from Minnesota Power's Laskin Energy Center in Hoyt Lakes, MN to the Northern Natural Gas pipeline, located approximately one mile to the south, to allow for the conversion of coal-fired stations into natural gas-fired stations. Minnesota Power proposes to locate the Project within T58W, R15N, Section 12 and T58W, R14N, Section 7 in St. Louis County, Minnesota. Topographic and aerial photo-based maps depicting the Evaluation Area and proposed route are attached. Construction of the Project is currently scheduled to begin in August 2014, or as soon as all required permits and approvals are obtained.

Minnesota Power has contracted with Merjent, Inc. (Merjent) to assist with the environmental review and permitting of the Project, including protected species consultations and field surveys. Upon review of the MN DNR's Natural Heritage Information System (in accordance with Merjent's Limited License to Use Copyrighted Material), Merjent has identified two records of the state-threatened wood turtle (*Glyptemys insculpta*) within 1 mile of the Project's Evaluation Area. Both of these records are associated with the Partridge River/St. Louis River system. No other state-listed species were identified within 1 mile of the project area.

The wood turtle is largely aquatic, preferring small- to medium-sized, fast-moving rivers and streams with adjacent deciduous and coniferous forests. The substrates of wood turtle streams typically consist of sand or gravel. Wood turtles will occupy adjacent alder thickets, forest, and grassland habitat for basking and foraging, typically staying within ¼ mile of the river or stream. Sandy, sparsely vegetated areas that are not prone to flooding and have ample exposure to direct sunlight provide important nesting sites.

The Project's Evaluation Area is located approximately 0.35 mile from the Partridge River, which is outside of the typical 0.25 mile basking, foraging, and nesting distance for this species. The Evaluation Area is also comprised of a developed area with existing infrastructure, including road and transmission line rights-of-way; with the proposed route located adjacent to an existing transmission line easement for the majority of its length. Based on the location of the project area in relation to the wood turtles preferred habitat, we believe it is unlikely that the wood turtle would occur in the Evaluation Area. In addition, Minnesota Power's commitment to implementing erosion and sediment control best management practices would further minimize the potential for indirect impacts to this species (i.e., siltation of streams caused by runoff). Therefore, we believe the Project is not likely to impact the state-threatened wood turtle.

By this e-mail, Minnesota Power is requesting your review and concurrence with this assessment of potential impacts to rare features.

Thank you in advance for your assistance on this Project, I look forward to hearing from you.

Sincerely,

Angie Durand

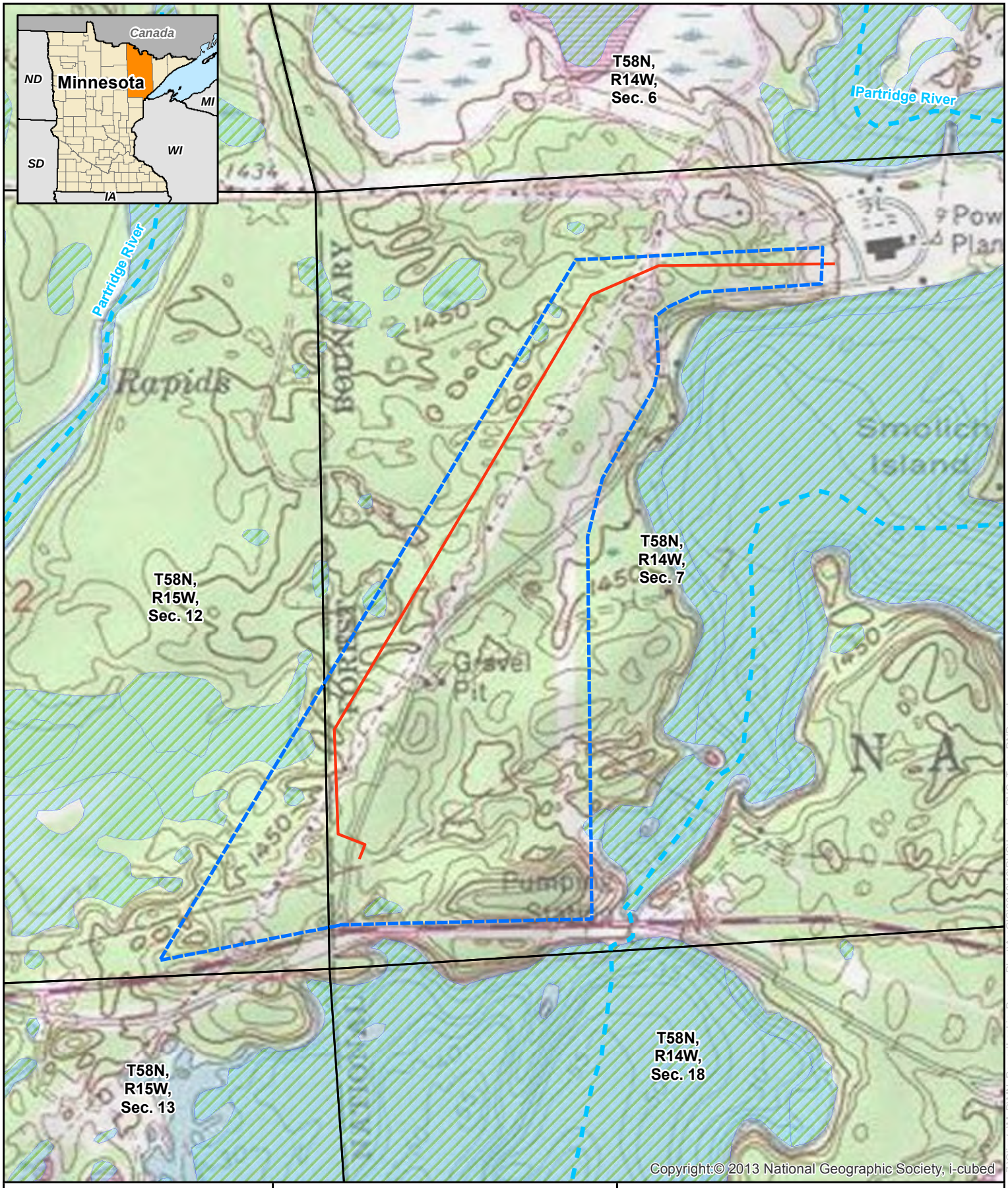
Angela Durand

TractorWorks Building
800 Washington Avenue N.
Suite 315
Minneapolis, MN 55401

612.746.3660 main
612.746.3666 direct
612.746.3679 fax

www.merjent.com

adurand@merjent.com



0 500 1,000 Feet

N W E S

Minnesota Power

Laskin Pipeline Project

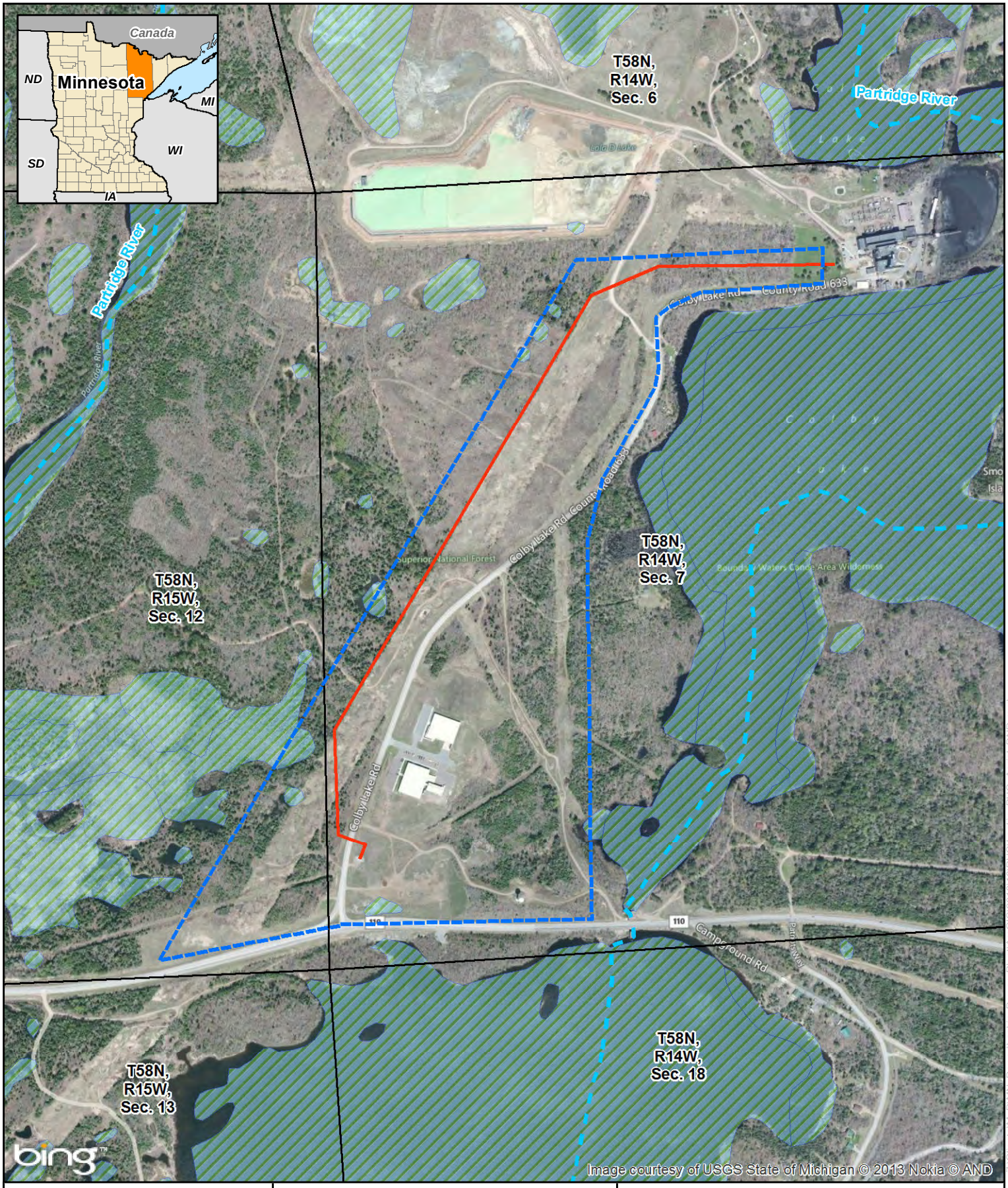
St. Louis County, Minnesota

Project Location – Topographic Map

- Proposed Centerline
- Waterbody
- Project Evaluation Area
- NWI Wetland
- Section, Township, Range Boundary

Source: Z:\Clients\M_P\MN_Power\Laskin_Power_Plant\ArcGIS\2013\10\PUC\Laskin_PUC_Topo_DNR.mxd

Date: (10/2/2013)



0 500 1,000 Feet

N W E S

Minnesota Power
Laskin Pipeline Project
St. Louis County, Minnesota
Project Location – Aerial Map

- Proposed Centerline
- Waterbody
- Project Evaluation Area
- NWI Wetland
- Section, Township, Range Boundary

Source: Z:\Clients\M_P\MN_Power\Laskin_Power_Plant\ArcGIS\2013\10\PUC\Laskin_PUC_Aerial_DNR.mxd

Date: (10/2/2013)