

August 21, 2025

VIA E-MAIL AND FEDERAL EXPRESS

Mr. Steven Kahl
Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480

**RE: Minnesota Power, an operating division of ALLETE, Inc.
HVDC Modernization Project – Oliver County
Siting Application
Case No. PU-24-381**

Dear Mr. Kahl:

Enclosed for filing in connection with the above-referenced matter are an original and four (4) copies of this letter and the results of Minnesota Power's Dakota Skipper presence/absence survey for phase 1 construction areas associated with the HVDC Modernization Project. Electronic copies of this letter and the enclosed survey report were filed today with the Commission via e-mail.

If you have any questions, please let me know.

Sincerely,


MOLLIE M. SMITH

MMS/87192862

Enclosure

cc: Adam Renfandt (via e-mail, w/ encls.)
Dalton Bruce (via e-mail, w/ encls.)
Dan McCartney (via e-mail, w/ encls.)



Mandy Bohnenblust
Sr. Consultant
Merjent
1 Main Street SE, Suite 300
Minneapolis, MN 55414

August 16, 2025

Ms. Bohnenblust,

Midwest Natural Resources, Inc. (MNR) is pleased to provide the following occupancy report for the federally listed Dakota skipper (*Hesperia dacotae*) in support of Minnesota Power's proposed HVDC Project, located southeast of the town of Center in Oliver County, North Dakota (**Figure 1**).

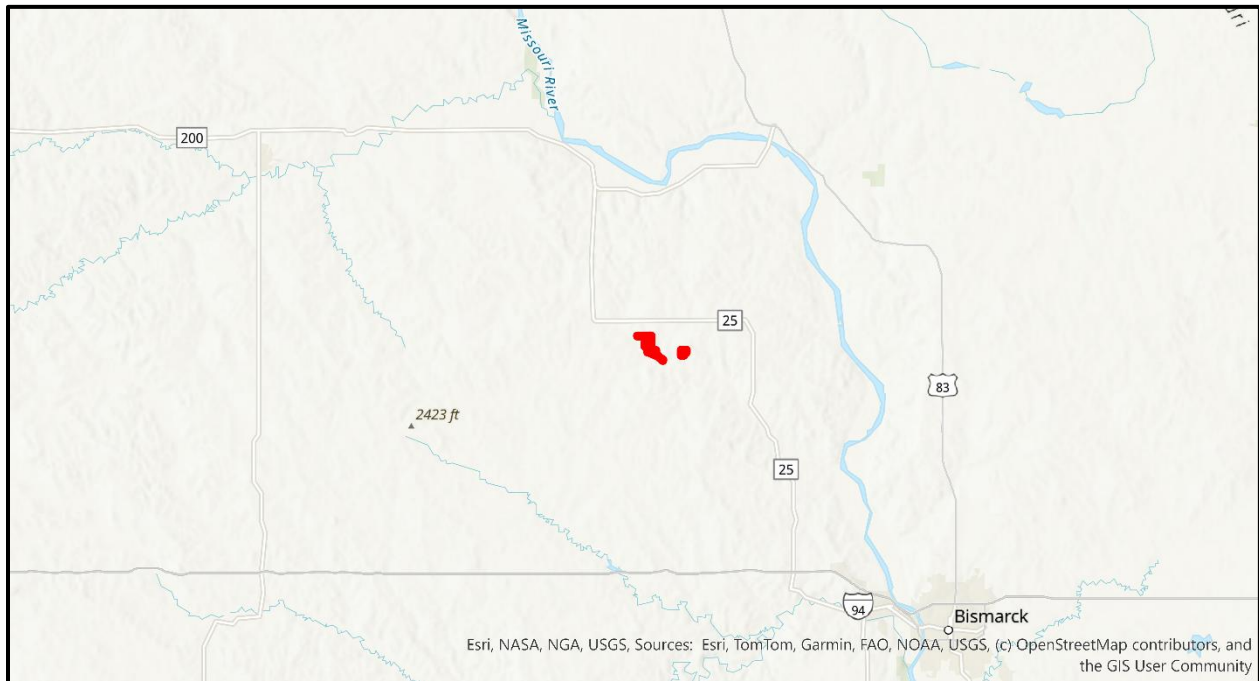


Figure 1. Project Location

METHODS

According to the US Fish and Wildlife Service (USFWS), the Dakota skipper is an obligate of high-quality, untilled prairie habitat dominated by native species. The larvae of this skipper rely on specific native bunch grasses, while the adult skippers require flowering native forbs, particularly narrow-leaved purple coneflower (*Echinacea angustifolia*), as nectar sources during their flight period (a roughly two-week period centered around July 4th). Also important to note is that the Dakota skipper does not occur in cropped or previously-cropped areas, non-native hay lands, pastures, grasslands dominated by non-native species, or areas with significant trees and/or shrub cover.

As outlined in the USFWS 2024 *Dakota Skipper (Hesperia dacotae)* Survey Protocol (Protocol)¹, the species occurs in two distinct habitat types which are referred to as Type A or Type B habitats. Type A habitats are wet-mesic prairies, associated with “near-shore glacial lake deposits,” with minimal topographic relief. Key graminoid species include big bluestem (*Andropogon gerardii*) and little bluestem (*Schizachyrium scoparium*), with prominent forbs including black-eyed susan (*Rudbeckia hirta*), wood lily (*Lilium philadelphicum*), harebell (*Campanula rotundifolia*), and mountain deathcamas (*Zigadenus elegans*).

Type B habitat consists of dry-mesic prairie on rolling topography associated with coarse glacial moraine deposits. This habitat type is dominated by little bluestem, big bluestem, and needle-and-thread or porcupine grasses (*Hesperostipa* spp.), as well as other native bunch grasses including side-oats grama (*Bouteloua curtipendula*), and prairie dropseed (*Sporobolus heterolepis*). In this habitat type, there is a notable abundance of native prairie forbs such as blanket-flower (*Gaillardia aristata*), prairie coneflower (*Ratibida columnifera*), and narrow-leaved purple coneflower. The latter species is recognized as one of the most important sources of nectar for adults in this habitat type.

Using this protocol, habitat for the species was mapped during previous habitat assessment efforts between 2022-2024. In all, twenty locations with potential Dakota skipper habitat were delineated (totaling 9.8 acres of habitat) within the current 423-acre project area (**Figure 2**). All the mapped habitat polygons within the Project boundaries are Type B habitat.

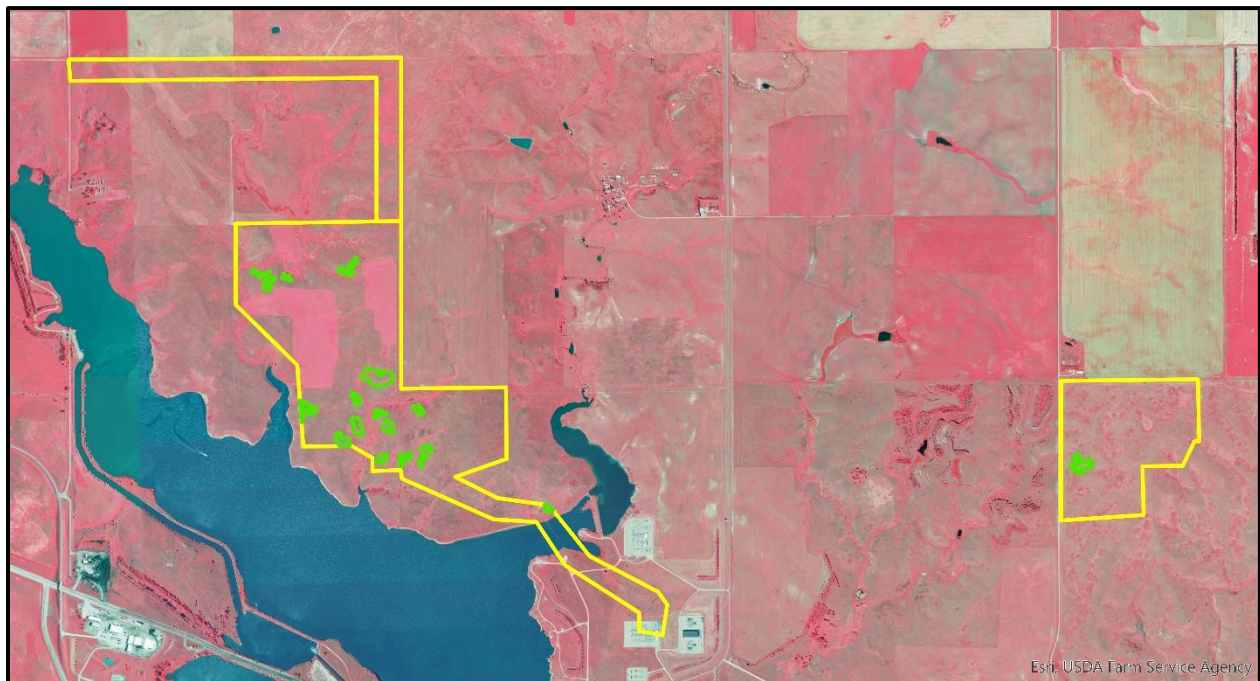


Figure 2. Project Area (symbolized in yellow) and Mapped Dakota Skipper Habitat (symbolized in green)

As part of the 2025 field effort, all previously mapped habitat areas were surveyed for occupancy three separate times between July 2-8, 2025. Additionally, survey efforts were led by MNR staff under federal recovery permit #TE28570D-0. As part of the survey efforts, weather conditions, including temperature, cloud cover, and wind speed, were recorded at each site at the start of surveys. Furthermore, each

¹ USFWS. 2024. 2024 Dakota Skipper (*Hesperia dacotae*) North Dakota Survey Protocol. USFWS Midwest and Mountain Prairie Regions.

surveyor’s route was recorded during the entirety of the surveys. Also, as part of the documentation process, all butterfly species/individuals encountered were recorded. Whenever possible, these were either identified to species; thus, at times, it was not possible to name each species, and each record was recorded at a higher taxonomic grouping.

RESULTS

In all, over twenty butterfly species were observed, with certain individuals identified to broader group (**Table 1**). No Dakota skippers were observed during surveys. However, two species currently in consideration for federal listing, the monarch (*Danaus plexippus*) and the regal fritillary (*Speyeria idalia*), were observed.

Common Name	Scientific Name	Count
Cabbage White	<i>Pieris rapae</i>	2
Clouded Sulphur	<i>Colias philodice</i>	5
Common Wood-Nymph	<i>Cercyonis pegala</i>	114
Coral Hairstreak	<i>Satyrium titus</i>	9
Crescent sp.		8
Delaware Skipper	<i>Anatrytone logan</i>	17
Fritillary sp.		1
Gray Copper	<i>Lycaena dione</i>	5
Gray Hairstreak	<i>Strymon melinus</i>	1
Long Dash	<i>Polites mystic</i>	18
Meadow Fritillary	<i>Boloria bellona</i>	1
Melissa Blue	<i>Plebejus melissa</i>	9
Monarch	<i>Danaus plexippus</i>	13
Northern Pearly-eye	<i>Enodia anhedon</i>	1
Orange Sulphur	<i>Colias eurytheme</i>	59
Painted Lady	<i>Vanessa cardui</i>	1
Pearl Crescent	<i>Phyciodes tharos</i>	11
Red Admiral	<i>Vanessa atalanta</i>	1
Regal Fritillary	<i>Speyeria idalia</i>	16
Silver-bordered Fritillary	<i>Boloria selene</i>	2
Skipper sp.		12
Sulphur sp.		36
Tawny-edged Skipper	<i>Polites themistocles</i>	9
Vanessa sp.		1
Variegated Fritillary	<i>Euptoieta claudia</i>	3
White sp.		1

As part of our reporting requirement specific to MNR’s federal recovery permit, results of this effort will be shared with the US Fish and Wildlife Service in our year-end report. We will include this report in that submittal.

In closing, we appreciate the opportunity to assist you with this project and welcome any questions or comments.

Respectfully submitted,



Scott A. Milburn, MS
Principal Botanist/Founder
Midwest Natural Resources, Inc.