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August 24, 2026

Via Electronic Mail & Hand Delivery

Mr. Brian Johnson
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480
ndpsc@nd.gov

In re: Minnesota Power
HVDC Line Structure Upgrade Project –
Cass, Barnes, Burleigh, Kidder, Oliver, Ransom,
Richland, and Stutsman Counties
Siting Exclusion Certificate
Our File No. 111345-000011

Dear Mr. Johnson:

Enclosed for filing please find eight copies of Minnesota Power's Certification Relating to N.D.C.C. § 49-22-03(4)(a)(1)(c) with Attachment A in the above-referenced matter.

Please feel free to contact me if you have any questions. Thank you.

Sincerely,



Casey A. Furey

CAF/lh
Enc.

cc: Claudia Ciganik (via email)
Sarah Whiting (via email)

STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

Minnesota Power **Case No. PU-26-___**
HVDC Line Structure Upgrade Project –
Cass Barnes, Burleigh, Kidder, Oliver, Ransom,
Richland, and Stutsman Counties
Siting Exclusion Certificate

CERTIFICATION RELATING TO N.D.C.C. § 49-22-03(4)(a)(1)(c)

STATE OF MINNESOTA)
) ss.
COUNTY OF ST. LOUIS)

Pursuant to N.D.C.C. § 49-22-03(4)(a)(1)(c), the undersigned, Daniel Gunderson, a representative of Minnesota Power, an operating division of ALLETE, Inc. (Minnesota Power) being first duly sworn upon oath, states as follows:

1. I am the Vice President – MP Transmission System Planning & Operations for Minnesota Power and have authority to act on behalf of and bind Minnesota Power.

2. Minnesota Power owns and operates a 250kV high voltage direct current (HVDC) transmission line in North Dakota. The HVDC originates near Center, ND and terminates in Hermantown, MN and spans approximately 465 miles. Minnesota Power seeks to upgrade 22 structures on the existing HVDC line to accommodate the capacity increases made available from Minnesota Power's HVDC Modernization Project. The structure upgrades will occur along approximately 233-miles of the HVDC line, within Barnes, Burleigh, Cass, Kidder, Oliver, Ransom, Richland, and Stutsman County (the "Project"). Project improvements include replacement of the existing aluminum lattice with a tubular steel monopole.

3. Construction of the HVDC line began in 1973, predating the enactment of N.D.C.C. ch. 49-22 (the "Siting Act"). Pursuant to N.D.C.C. § 49-22-03(4)(a)(1)(c), a corridor width of 350 feet on either side of the centerline is designated for lines constructed prior to April 9, 1975. Thus, a 350-foot corridor has been applied to the Project (the "Corridor"), as reflected in Attachment A, Exhibit A hereto.

4. Minnesota Power conducted an environmental analysis of the relevant portion of the Corridor to assess the Commission's exclusion and avoidance area criteria designated under N.D. Admin. Code § 69-06-08-02(1)-(2). The analysis is contained in Attachment A hereto.

5. Construction of the Project relates to improvements to an existing electric transmission facility. Thus, the proposed activities are for the same type of facility as currently exists. *See* N.D.C.C. § 49-22-03(4)(a)(1).

6. Construction of the Project improvements will occur within a width of 350 feet on either side of the Project's centerline; the statutorily designated corridor for electric transmission lines in which constructed commenced prior to 1975. *See* N.D.C.C. § 49-22-03(4)(a)(1)(c).

7. Pursuant to N.D.C.C. § 49-22-03(4)(a)(4),

    a. Activities will not affect known exclusion or avoidance areas.
    b. Activities are to improve the existing electric transmission facility.
    c. Minnesota Power will comply with all applicable conditions and protections in siting laws and rules. Construction of the HVDC line commenced prior to the enactment of the Siting Act. As a result, there are no prior Commission orders governing the Project.

8. Minnesota Power intends to begin activities for the Project improvements as soon as possible pending receipt of the Commission's acknowledgement pertaining to this filing.

Minnesota Power

Dated 8/21/26

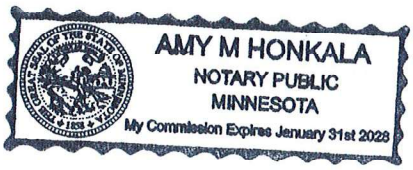
By _____
Daniel Gunderson
Vice President - Transmission System Planning & Operations

STATE OF MINNESOTA)
) ss.
COUNTY OF ST. LOUIS)

On this 21st day of August, 2026, subscribed and sworn to before me by Daniel Gunderson as Vice President - MP Transmission System Planning & Operations for Minnesota Power.

Jan. 31st 2028
Expiration of Commission

Amy M. Honkala
Notary Public



ATTACHMENT A

HVDC Line Structure Replacement Project

Minnesota Power



SUMMARY OF ENVIRONMENTAL ANALYSIS FOR NDPSC CERTIFICATION

Prepared by:



1 Main Street SE, Suite 300
Minneapolis, Minnesota 55414

August 2026

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1.0 INTRODUCTION

Minnesota Power, an operating division of ALLETE, Inc., owns and operates a 250-kilovolt (kV) High Voltage Direct Current (HVDC) Transmission Line in North Dakota. Minnesota Power is proposing a project to upgrade 22 structures on their existing HVDC Line, referred to as the HVDC Line Structure Upgrade Project (Project), to accommodate the capacity increases made available from the HVDC Modernization Project. The structure upgrades will occur along approximately 233-miles of the HVDC Line, within Barnes, Burleigh, Cass, Kidder, Oliver, Ransom, Richland, and Stutsman County. Minnesota Power contracted with Merjent, Inc. (Merjent) to assist with environmental review and permitting for the Project. This report summarizes the environmental analysis conducted for Minnesota Power's Certification Pursuant to NDCC § 49-22-03(4)(a)(4) to be filed with the North Dakota Public Service Commission (PSC).

The original HVDC Line was constructed using aluminum lattice structures, located within a 120-foot-wide easement. Minnesota Power proposes to replace the existing aluminum lattice structures with a tubular steel monopole. The Project Area, defined as the structure replacement workspace and associated temporary access and staging areas, will be restored to preconstruction conditions outside of each structure replacement footprint (see Exhibit B Figure in Appendix A). Construction is tentatively scheduled to begin in September 2026, with replacement of the majority of structures expected to be completed within approximately one month. A limited number of structures will be replaced during frozen ground conditions, with that work anticipated to occur in February 2027. The Project is anticipated to be in-service by spring 2027 or immediately after structure replacements are completed.

1.1 NORTH DAKOTA PUBLIC SERVICE COMMISSION

Construction of the HVDC Line was initiated in 1973 and the Line was commissioned in 1977, prior to enactment of the Siting Act (NDCC Ch. 49-22). For the Project, Minnesota Power plans to comply with the siting exclusion certification requirements of NDCC § 49-22-03(4)(a). Since the HVDC Line was constructed before April 9, 1975, a corridor width of 350 feet on either side of the centerline (Project Corridor) applies pursuant to NDCC § 49-22-03(4)(a)(1)(c), and Minnesota Power will conduct all Project construction activities within this Corridor, with the exception of some temporary access routes needed to reach structure replacements.

2.0 ENVIRONMENTAL ANALYSIS

Merjent conducted an environmental analysis of the Project using field surveys, publicly available data, and agency consultations. A summary of the environmental analysis is provided below.

2.1 WETLAND DELINEATION AND NATURAL RESOURCE FIELD SURVEYS

Merjent conducted a wetland and waterbody delineation and habitat assessment survey on September 22 to 26, 2025 and May 19 to 22, 2026. Surveys were conducted within a 351.2-acre survey area in discrete locations across the aforementioned counties. The Project Area falls entirely within the surveyed area.

Wetland delineations followed methodology from the *USACE Wetlands Delineation Manual* (Environmental Laboratory, 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Great Plains Region* (USACE, 2010). Other waters can include, but are not limited to, streams, open waterbodies, and ditches.

Based on the field survey and review of desktop resources, Merjent determined that 43 wetlands totaling 25.94 acres, four streams totaling 0.06 acre, and three open waterbodies totaling 2.12 acres exist within the Survey Area. The Project has been designed to minimize potential impacts to wetlands. The existing HVDC Line crosses some wetland areas. In those areas, the Project will have limited permanent wetland impacts for structure placement. Other impacts to wetlands due to construction activities will be temporary and the areas will be restored following construction. Any wetland impacts will be covered by a U.S. Army Corps of Engineers Section 404 Nationwide Permit, and Minnesota Power will comply with the applicable permit requirements.

Field-based habitat assessment was conducted where desktop review was not able to rule out suitable habitat for federally threatened and endangered species. Habitat assessments were conducted at Structure 1463 as detailed below. Additionally, Dakota skipper assessments and/or presence/absence surveys were completed as outlined in Section 2.2.5.

2.2 SPECIES ASSESSMENT

Merjent, on behalf of Minnesota Power, reviewed the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) website[1] for a list of USFWS Endangered Species Act (ESA) threatened, endangered, proposed, and candidate species and designated critical habitat that may have been documented within the vicinity of the Project. An official species list from the USFWS North Dakota Ecological Services Field Office is enclosed.

TABLE 1
USFWS ESA Species and Critical Habitat Potentially Present in the Project Area

Scientific Name	Common Name	Federal Status	Designated Critical Habitat
Northern Long-Eared Bat	*Myotis septentrionalis*	Endangered	None
Piping Plover	*Charadrius melodus*	Threatened	None
Rufa Red Knot	*Calidris canutus rufa*	Threatened	None
Whooping Crane	*Grus americana*	Endangered	None
Dakota Skipper	*Hesperia dacotae*	Threatened	None
Monarch Butterfly	*Danaus plexippus*	Proposed Threatened	None
Western Regal Fritillary	*Argynnis idalia occidentalis*	Proposed Threatened	None
Suckley's Cuckoo Bumble Bee	*Bombus suckleyi*	Proposed Endangered	None
Western Prairie Fringed Orchid	*Platanthera praeclara*	Threatened	None

2.2.1 NORTHERN LONG-EARED BAT

The northern long-eared bat *(Myotis septentrionalis)* is a medium-sized, migratory bat with a range that stretches across much of the eastern and midwestern United States. Habitat use changes throughout the year and varies depending on the sex and reproductive status of the species. In winter, the species will hibernate in caves and abandoned mines that have relatively constant, cooler temperatures with high humidity and no strong air currents. The species is found hibernating within deep crevices or cracks of the hibernaculum.

During the summer, reproductive females form maternity colonies that are variable in size, ranging from a few individuals to as many as 60 adults, while males and non-reproductive females roost alone. Suitable summer habitat for northern long-eared bats varies for roosting, foraging, and traveling (e.g. emergent wetlands, field edges); however, the species is predominantly found in intact, interior forested/wooded habitat. This habitat can consist of dense or loose aggregates of trees with varying canopy closure or linear wooded features such as fencerows, riparian forests,

[1] Information for Planning and Consultation (IPaC). USFWS website. Available at https://ecos.fws.gov/ipac/. Accessed April 2026.

or other wooded corridors as long as the sites contain potential roosting areas consisting of live tree or snags that are ≥3 inches diameter at breast height (dbh), have exfoliating bark, cracks, crevices, or cavities, and is found within 1,000 feet of other forested or wooded habitat as the species tends to stay close to more densely forested areas while foraging. The species has been documented roosting in a wide variety of tree species, opportunistically utilizing trees with suitable cavities or bark. Less frequently, northern long-eared bats have been observed roosting in man-made structures such as barns, bridges, and buildings.

Northern long-eared bats are rarely found in North Dakota as they are considered seasonal to the state with no hibernacula yet being found. Critical habitat has not been designated in North Dakota for the northern long-eared bat. The species has been identified in a few forested habitats in North Dakota including the Turtle Mountains, and the riparian corridors of the Little Missouri River and Missouri River. The closest structure to the "primary range"[2] of the species is along the Missouri River and has a small patch of trees along the utility right-of-way. All other structures are located within the "possible range" for northern long-eared bats in North Dakota and are unlikely to be present on the landscape due to forested patches and riparian areas being disconnected for more than 1000-feet.

Project actions, as currently proposed, do not include tree clearing. With this, and the lack of suitable habitat in most of the Project, impacts are not expected to occur to northern long-eared bats. As the species has been documented in patches throughout the state, should the scope change and tree clearing need to occur, impacts could be possible; however, to avoid these impacts, tree clearing would be done during the species inactive season (November 1 – April 14) unless a habitat assessment or survey determined roosting trees or individual(s) are not present.

2.2.2 PIPING PLOVER

The piping plover is a migratory shorebird with a length of about 7¼ inches and a wingspan of about 19 inches. The species breeds and nests in three locations in North America: the shorelines of the Great Lakes, the shores of rivers and lakes in the Northern Great Plains, and along the Atlantic Coast. In North Dakota, specifically, this species uses the gravelly and sandy beaches along the Missouri River and Lake Sakakawea and alkali wetlands in the prairie pothole region for breeding and nesting during the summer months.

In the fall, piping plovers migrate from northern breeding and nesting grounds and overwinter primarily along Gulf Coast beaches from Florida to Mexico, along the Atlantic Coast from North Carolina to Florida, and on Caribbean islands. Wintering piping plovers prefer bare or very sparsely vegetated tidal mudflats, sand flats, or algal flats – areas that are periodically covered with water and then exposed either by tides or wind. Tidal flats formed at the base of jetties and tidal passes are also important feeding areas where plovers forage on insects, spiders, and crustaceans. Threats to this species include habitat loss and degradation, particularly of coastal beaches, and nest disturbance and predation.

Federally designated critical habitat (DCH) is present within North Dakota mainly along the shores of the Missouri River, wildlife refuge areas, and alkali lakes following the Missouri Coteau. There is no DCH that occurs within or near the Project; therefore, adverse impacts from the Project will not occur to DCH.

[2] North Dakota Game and Fish. https://gf.nd.gov/ecology/species/mammals/northern-long-eared-bat. Access May 2026.

Direct impacts to nesting habitat (sand and gravel beaches, alkali flats, gravel shoreline, and river sandbars) will not occur due to Project actions. Project construction is proposed to occur in September 2026 and February 2027, outside of the piping plover's nesting season (April 15 – August 15); therefore, the species is unlikely to occur during the time of construction. Additionally, all structures are more than 0.5-mile from what would be considered suitable habitat for the piping plover. Given this, impacts are not expected to occur to the species or to designated critical habitat.

2.2.3 RUFA RED KNOT

The rufa red knot is a large sandpiper known for its long-distance migration between breeding grounds in the Canadian Arctic and several wintering areas in the southern hemisphere. In North Dakota, the species is a rare migrant, travelling annually between its northern breeding and nesting grounds and several wintering regions, including the southeast United States, the northeast Gulf of Mexico, northern Brazil, and Tierra del Fuego at the southern tip of South America. The species does not breed in North Dakota. Most first-year (hatch-year) birds migrate south to the same wintering regions as the adults; however, after their first winter, these juveniles do not typically migrate all the way back north to the breeding grounds but rather complete this journey during their second year. Instead, they will spend their first summer in coastal areas from South America to southern Canada, including the interior United States as far west as the Great Plains. Research suggests that this species uses inland saline lakes for stopover habitat within the Northern Great Plains; however, there is limited evidence to suggest the species would use inland freshwater habitat during migration.

Federally designated critical habitat has been proposed for the red knot; however, North Dakota is not a part of those proposed locations. Although red knots are found primarily in intertidal habitats, especially near coastal inlets, estuaries, and bays, they have been observed in both alkaline and freshwater lakes of North Dakota during migration as well as within the Missouri River drainage system, sewage lagoons, and large permanent freshwater wetlands. Observations have been scattered throughout the state without consistent stopover sites being observed. Suitable habitat consisting of coastal marine and estuarine areas, or freshwater lakes was not found during a desktop review. With the absence of preferred nesting and foraging habitat, it is unlikely that the rufa red knot would occur at the Project location.

2.2.4 WHOOPING CRANE

The historic range of the whooping crane extended from the Arctic coast south to central Mexico, and from Utah east to New Jersey, into South Carolina, Georgia, and Florida. There are now only four populations of whooping cranes in North America. One population consists of captive-raised birds that migrate between Wisconsin and Florida, classified as experimental/non-essential under the ESA. A second is a non-migratory, captive-raised population in central Florida, classified as experimental/non-essential under the ESA. The third is a non-migratory flock introduced to White Lake, Louisiana in 2011. The fourth is a self-sustaining, wild population, classified as endangered under the ESA. The Project Area is within this endangered population's range.

This endangered population embarks on a bi-annual migration through the interior United States from summer nesting and breeding grounds in Wood Buffalo National Park in northern Alberta to the barrier islands and coastal marshes of the Aransas National Wildlife Refuge on the Gulf Coast of Texas. During migration, birds stop feeding daily at stopover sites foraging and resting, between March 15 and May 15 (spring migration) and again between September 10 and November 15 (fall migration). They primarily forage for waste grains in agricultural fields but will

also eat frogs, fish, crayfish, insects, and plant tubers. They also utilize upland freshwater sites and forage for acorns, crayfish, insects, and snails. Migrating cranes will use various habitats for roosting such as riverine habitats with sandbars and shallow river channels along with shallow, freshwater inland wetlands.

This migration occurs within an approximately 200-mile-wide corridor that has 95% of the confirmed whooping crane sightings. A migration corridor map, developed by the U.S. Geological Survey Northern Prairie Wildlife Research Center, displays the whooping crane migration corridor into 50, 75, and 95 percentile bands. The 50% corridor area is a “core” migratory corridor but is displayed as 50% due to the more concentrated and narrower corridor that contains less confidence in the corridor boundaries. Meanwhile, the 95% corridors are much broader, and include all 50% and 75% corridors, and represent a higher confidence in the corridor boundaries. As the Project occurs from north of Bismarck, North Dakota to southwest of Fargo, North Dakota, the structures occur through various bands.

A preliminary desktop review indicated that suitable stopover habitat for the species is present within most of the Project as there are shoreline habitats and foraging opportunities in agricultural fields when waste grains may be available. The Project is proposed for September 2026, during the fall migration, and whooping cranes that are within 1.2-miles of the Project area could be disturbed and leave the area, which, during this time of year, may cost the individual(s) energetically. However, during a field survey by qualified Merjent biologists from May 19-22, 2026, results indicated that suitable habitat is not present. As such, impacts to the species are not expected to occur.

2.2.5 DAKOTA SKIPPER

The Dakota skipper is a small-to-medium sized butterfly characterized by a short, sturdy body and a quick, skipping flight. Adult males are tawny-orange to brown on dorsal surfaces with lighter, dusty yellow-orange ventral surfaces; forewings display conspicuous dark markings. Dakota skipper adults have a lifespan of only a few weeks; during this time, if conditions allow, the species mates and the females lay eggs on underside of leaves. Larvae shelter in the duff at or below the ground surface, feeding at night until fall, when the species becomes dormant. Larvae overwinter at the base of plants until the following spring when larvae emerge and continue to develop. The species is an obligate of untilled, high-quality native prairies containing a variety of wildflowers and grass. Provided these conditions are present, the species can be found in both wetlands and uplands, but do not thrive in heavily grazed or cultivated areas. Dakota skippers can occur in two different habitat types, identified as Type A and Type B by USFWS. Type A habitat is wet-mesic prairie, associated with “near-shore glacial lake deposits,” with minimal topographic relief. Type B habitat is dry prairie on rolling topography associated with course glacial moraine deposits (see Appendix C for more details).

USFWS listed the Dakota skipper as threatened on October 23, 2014. Once widely distributed throughout the north-central United States and south-central Canada, the Dakota skipper range is now greatly reduced, and the species is considered extirpated from Illinois and Iowa and is no longer found east of western Minnesota. The loss and degradation of prairie ecosystems has drastically reduced Dakota skipper habitat, and populations have become increasingly fragmented and isolated. Threats to the species include conversion of native prairie lands to agricultural purposes, increased fragmentation of habitat patches due to ongoing infrastructure development, and the effects of climate change.

Further assessment of grassland habitat was conducted within the Project area in October 2025 and May 2026 (see Appendix C). This field evaluation identified five locations (two associated with Structure 53 and three associated with Structure 239) totaling 0.48 acre of suitable DASK Type B habitat. The DASK habitat at Structure 53 can be avoided during construction. As such, the field-delineated habitat areas at Structure 239 were surveyed for occupancy on three separate occasions between July 3 - 8, 2026 by qualified Midwest Natural Resources (MNR) staff under federal recovery permit #TE28570D-0. During this occupancy survey, there were no individual DASK observed. With this, these locations can be assumed unoccupied by DASK until the start of the next flight period, or early June 2027. As the Project is proposed to begin September 2026, the Project may assume the locations unoccupied and impacts to the species are not expected to occur.

2.2.6 MONARCH BUTTERFLY

The monarch butterfly is well-known for the species' long-distance migration throughout North America. There are two populations, located east and west of the Rocky Mountains. Primary drivers affecting the monarch include loss and degradation of habitat, exposure to insecticides, and climate change. The species can be found in a wide variety of habitats including prairies, grasslands, urban gardens, road ditches, and agricultural fields, if there are a healthy and abundant milkweed supply and a diversity of nectar resources. Milkweed is the sole host plant for oviposition and for the larvae to feed on until the larvae pupates into a butterfly. Most adults only live approximately two to five weeks; however, some overwintering adults live six to nine months as they undergo reproductive diapause.

Based on the widespread range of the monarch and the potential presence of suitable habitat, the monarch butterfly may occur in the Project. Project actions may have minor, temporary impacts on native vegetation serving as habitat to monarch butterflies; however, no long-term, significant impacts are anticipated. If the USFWS subsequently determines the species should be listed and protection for the species coincides with Project construction, Minnesota Power will coordinate with the USFWS at that time.

2.2.7 WESTERN REGAL FRITILLARY

The western regal fritillary butterfly is found in large, intact, contiguous native tallgrass prairie habitats in portions of Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota, Oklahoma, South Dakota, Wisconsin, and Wyoming. Regal fritillaries can range widely with females potentially traveling up to 100 miles searching for three main habitat components: violet hostplants for larvae, nectar plants for adults, and native grasses to provide protection throughout the life cycle. Adults can be found foraging in both upland and wet prairie habitats; however, habitat can only be considered suitable for all life stages if violet species are present to provide shelter and forage for larvae. The density of violets seems to correlate positively to number of butterflies within a given area. Habitat alteration has reduced the species' range and abundance.

As evidenced by the desktop review, the Project overlaps the western regal fritillary's current range. Because the western regal fritillary is a grassland specialist that is unable to survive in row crop fields, non-native pastures, and developed areas surrounding prairie remnants, their presence may be limited to the larger grasslands and the occasional smaller grassland parcels that they utilize for dispersal. Native prairies in and adjacent to the Project Area have the potential to contain violets. Based on the presence of available suitable habitat, the western regal fritillary may occur in the Project Area.

Project actions may have minor, temporary impacts on native vegetation serving as potential habitat to western regal fritillaries; however, no long-term, significant impacts are anticipated. If the USFWS subsequently determines the species should be listed and protection for the species coincides with Project construction, Minnesota Power will coordinate with the USFWS at that time.

2.2.8 SUCKLEY'S CUCKOO BUMBLE BEE

Suckley's cuckoo bumble bee is a parasitic species which usurps the nests of other Bombus species. As an obligate social parasite of social bumble bees, the species requires a host colony to raise young born from eggs laid by Suckley females; the species cannot successfully reproduce without the workers of the host colony to continue collecting pollen and nectar to feed her offspring. Documented host species include the Nevada bumble bee (Bombus nevadensis) and the Western bumble bee (*Bombus occidentalis*). Once developed, all Suckley's adults are reproductive, and leave the nest to mate; males die after mating, but mated females feed on nectar and pollen prior to overwintering. Females overwinter underground or in leaf litter, mulch, decomposing vegetation, or under logs that produce suitable thermal qualities to survive the winter months. Females emerge from hibernation in late spring after host species queens emerge and start forming colonies (i.e., early April to late May, depending on region); female Suckley's bees will forage alone until entering a suitable host colony.

The species is found in a variety of habitats, including prairies, grasslands, farmsteads, woodlands, boreal forests, active and fallow agricultural fields, and urban areas. Suitable summer foraging areas will include a diversity of nectar and pollen sources, and host nests are often located in abandoned rodent burrows or other underground cavities. Knowledge of overwintering sites is limited; sites reported in the literature for other Bombus species include sandy, well-drained underground sites, shaded areas near tree lines, or other areas with low moisture levels and protection from environmental and physical stressors.

The Project is within Suckley's cuckoo bumble bee's primary range. As evidenced during the desktop review, portions of the Project Area may potentially provide suitable breeding, foraging, and dispersal habitat for the species. Based on the range of the species and the presence of suitable habitat, Suckley's may occur in the Project. Project actions may have minor, temporary impacts on native vegetation serving as habitat for Suckley's; however, no long-term, significant impacts are anticipated. If the USFWS subsequently determines the species should be listed and protection for the species coincides with Project construction, Minnesota Power will coordinate with the USFWS at that time.

2.2.9 WESTERN PRAIRIE FRINGED ORCHID

Western prairie fringed orchid is a perennial orchid of the North American tall grass prairie and is found most often on unplowed, calcareous prairies and sedge meadows. Soil moisture is a critical determinant of growth, flowering, and distribution. Pollination is required for seed production, and the species is pollinated by only a few species of sphinx moths. Seeds are wind-dispersed and may also be adapted for dissemination through the soil profile by water. This species is dependent on mycorrhizal fungi for seed germination and nutritional support before plants are capable of photosynthesis. The persistence of western prairie fringed orchids is dependent on periodic disturbance by fire, mowing, or grazing, but these practices may also cause adverse effects and must be carefully implemented.

North Dakota has one of the largest remaining populations of western prairie fringed orchids; however, the range is restricted to Ransom and Richland counties, particularly within the Sheyenne National Grasslands. Four structures (1463, 1485, 1499, and 1545) are found within the northern part of these two counties. Due to either current or historic disturbance through agricultural practices, suitable habitat is not present at any of these structures except for potentially 1463, where, via aerial imagery, it appears the field has been left to fallow, potentially allowing wind-dispersed seeds to immigrate into the area. A field survey at this location was conducted between May 19-22, 2026, by qualified Merjent biologists to determine habitat suitability. Results of the survey indicate that suitable habitat is not present; therefore, impacts to this species are not expected to occur.

2.2.10 BALD AND GOLDEN EAGLE PROTECTION ACT

The BGEPA prohibits anyone without a permit issued by the Secretary of the Interior from taking bald (*Haliaeetus leucocephalus*) or golden (*Aquila chrysaetos*) eagles, including their parts, nests, or eggs. The BGEPA provides criminal and civil penalties for persons who take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald or golden eagle, alive or dead, or any part, nest, or egg thereof. The BGEPA defines take as pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb. "Disturb" means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available: 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior. In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagles return, such alterations agitate or bother an eagle to a degree that injures an eagle or substantially interferes with normal breeding, feeding, or sheltering habits and causes, or is likely to cause, a loss of productivity or nest abandonment.

In North Dakota, bald eagle breeding season begins January 15 and lasts through August 31. Most bald eagles nest in secluded forested landscapes or along wooded streams and lakes. Generally, the combination of a large tree (such as a cottonwood), a food supply, and water within reasonable flying distance provide suitable bald eagle nesting habitat. North Dakota also supports populations of golden eagles, primarily found in the western part of the state. No eagle nests were identified during the natural resource field surveys (dated September 2025 and May 2026). However, if an active eagle nest is identified within 660 feet of the Project Area during the nesting season, Minnesota Power will stop work and, if necessary, coordinate with the USFWS to comply with BGEPA.

2.3 CULTURAL RESOURCE FIELD SURVEY

Merjent conducted a Class I and Class III cultural resource inventory in support of the Project to determine impacts relative to archaeological sites. Results of the Class I literature review identified 84 cultural resources within 1 mile of the Project. The resources consist of two architectural sites, 11 isolated finds, 27 site leads, and 44 archaeological and historical sites. Two previously recorded site leads extend into the Project. The site leads are currently unevaluated for listing in the National Register of Historic Places (NRHP).

The Class III inventory was conducted November 5-6, and 24, 2025, and May 21-22, 24, and 28, 2026. The effort involved inventory of the transmission line corridor (approximately 388 acres) located in multiple locations in Barnes, Burleigh, Cass, Kidder, Oliver, Ransom, Richland, and

Stutsman Counties, North Dakota. The previously recorded site lead was revisited, and nine new cultural resources were identified. The newly identified resources consist of one isolated find, two site leads, and six archaeological sites. No evidence of the previously recorded site leads were found within the Project and no avoidance is recommended. The isolated find was determined to be not eligible for the NRHP, and no further work is required. The newly recorded site leads, and six sites are all currently unevaluated for the NRHP. All construction traffic within the site leads will be restricted to existing roads; none of the structure replacements are located within the boundaries of the site leads. Merjent has recommended the archaeological sites will be avoided by 75-feet and all construction be limited to existing roads (if present) in the vicinity of the sites. However, where sites cannot be avoided by 75-feet due to landowner constraints, Merjent has recommended that a minimum 25-foot avoidance buffer be used, temporary site fencing be installed prior construction, and a cultural resource monitor be present during construction activities near the site locations.

Merjent has recommended a determination of "No Historic Properties Affected" provided the avoidance recommendations are followed. As of the date of this memo, the Class I and Class III report has been submitted to the North Dakota State Historic Preservation Office (NDSHPO) for review and concurrence; NDSHPO response is pending at this time.

2.4 NORTH DAKOTA PUBLIC SERVICE COMMISSION EXCLUSION/AVOIDANCE AREA REVIEW

Merjent conducted a review of the North Dakota Administrative Code (NDAC) § 69-06-08-02 Transmission Facility Corridor and Route Criteria for the Project using information collected through desktop/publicly available data[3] and field surveys. Additionally, Minnesota Power submitted a request for agency review and comment to all designated agencies and officers outlined in NDAC § 69-06-01-05, including but not limited to USACE, USFWS, the State Historical Society of North Dakota, and U.S. Department of Defense. Where a response was received as of the date of this submittal, it is noted below, if applicable, and included in Appendix B. The Transmission Facility Corridor and Route Criteria (NDAC § 69-06-08-02) exclusion and avoidance areas have been analyzed for the Project (see Table 3 below).

[3] The sources of publicly available geographic information systems (GIS) data utilized for this analysis included the NDGISHUB, ESRI, EPA, National Park Service, PAD-US 4.1, USDA, USFWS, NRCS, USGS, and NDGS GIS sources.

TABLE 3

North Dakota Public Service Commission Exclusion and Avoidance Areas for Transmission Facilities

Exclusion/Avoidance Areas	Impacted by the Project	Description
Exclusion Areas (North Dakota Administrative Code, § 69-06-08-02(1), Transmission Facility Corridor & Route Criteria)		
Designated or registered national: parks; memorial parks; historic sites and landmarks; natural landmarks; monuments; and wilderness areas.	No	Based on publicly available data from ESRI and Protected Areas Database of the United States (PAD-US) 4.1 Spatial Analysis and Statistics, no designated or registered national: parks; memorial parks; historic sites and landmarks; natural landmarks; monuments; and wilderness areas are present within the Project Corridor. As a result, the Project will not impact these resources.
Designated or registered state: parks; historic sites; monuments; historical markers; archaeological sites; and nature preserves.	No	Based on publicly available data through the NDGISHUB, no designated or registered state: parks; historic sites; monuments; historical markers; or nature preserves are present within the Project Corridor. As a result, the Project will not impact these resources.
County parks and recreational areas; municipal parks; and parks owned or administered by other governmental subdivisions.	No	Based on ESRI and PAD-US 4.1 data, no county parks and recreational areas; municipal parks; and parks owned or administered by other governmental subdivisions are present within the Project Corridor. As a result, the Project will not impact these resources.
Areas critical to the life stages of threatened or endangered animal or plant species.	No	Merjent reviewed the USFWS IPaC list of threatened, endangered, proposed, and candidate species and designated critical habitat in the Project Corridor. No designated critical habitat has been documented within the vicinity of the Project Corridor. Additionally, Merjent conducted a desktop review of the Project Corridor and field surveys, where necessary, in support of the Project. No threatened or endangered species were identified, and no threatened or endangered animal or plant species are expected to be impacted by the Project. See Section 2.2.
Areas where animal or plant species that are unique or rare to this state would be irreversibly damaged.	No	Merjent conducted a desktop review of the Project Corridor and field surveys in 2025 and 2026, where necessary, in support of the Project. No unique or rare plant species were identified, and no rare or unique animals are expected to be impacted by the Project. See Section 2.2.
Areas within 1,200 feet of the geographic center of an intercontinental ballistic missile (ICBM) launch or launch control facility.	No	Merjent on behalf of Minnesota Power, requested review and comment from the U.S. Department of Defense (USDOD), Grand Forks Air Base, and Minot Air Force Base. No response was received, but an online review of missile facilities did not identify any within 1,200 feet of the Project (ND 2026). As a result, no impacts are anticipated.

Areas within 30 feet on either side of a direct line between an ICBM launch facility and a missile alert or launch control facilities to avoid microwave interference.	No	Merjent, on behalf of Minnesota Power, requested review and comment from the USDOD, Grand Forks Air Base, and Minot Air Force Base. No response was received, but an online review of missile facilities did not identify any that would result in the Project being located within 30 feet from either side of a direct line between facilities. As a result, no impacts are anticipated.
Exclusion/Avoidance Areas	**Impacted by the Project**	**Description**
Avoidance Areas (North Dakota Administrative Code, § 69-06-08-02(2), Transmission Facility Corridor & Route Criteria)		
Designated or registered national: historic districts; wildlife areas; wild, scenic, or recreational rivers; wildlife refuges; and grasslands.	No	Merjent reviewed the National Wild and Scenic Rivers System online database; there are no designated wild and scenic rivers in ND, and no designated wilderness areas are within the Project Corridor. Based on the NDGISHUB, USGS PAD-US 4.1, and USFWS data, no existing USFWS lands or easements are located in the Project Corridor. Based on NRHP data, no historic districts are located in the Project Corridor. As a result, no impacts are anticipated.
Designated or registered state: wild, scenic, or recreational rivers; game refuges; game management areas; management areas; forests; forest management lands; and grasslands.	No	No structure replacements are within registered state: wild, scenic, or recreational rivers; game management areas; management areas; forests; forest management lands; and grasslands. As a result, no impacts are anticipated.
Historical resources which are not designated as exclusion or avoidance areas.	No	Merjent conducted a Class I and Class III cultural survey in support of the Project to identify archaeological sites. Nine newly identified resources consisting of one isolated find, two site leads, and six archaeological sites were discovered during the survey; the site leads and six sites are currently unevaluated for the NRHP. Merjent has recommended the archaeological sites be avoided by 75-feet. However, where 75-foot avoidance is not feasible, Merjent has recommended a minimum 25-foot avoidance buffer, that temporary site fencing be installed, and a cultural resource monitor be present during construction activities near the site location. Refer to Section 2.3. Based on the results of the Class I and Class III investigations and the avoidance and/or mitigation measures that will be implemented, no impacts to historical or cultural resources are anticipated.
Areas that are geologically unstable.	No	Merjent reviewed the North Dakota Geologic Survey's landslide deposit data (NDGS 2023) and abandoned mine data found on the NDGISHUB; no landslides or abandoned mines are located in the Project Corridor. As such, no impacts are anticipated.
Within 500 feet [152.4 meters] of a residence, school, or place of business. This criterion shall not apply to a water pipeline transmission facility. This avoidance area may be waived by the owner.	No	No residences, schools, or businesses are within 500 feet. As a result, no impacts are anticipated.

Reservoirs and municipal water supplies.	No	Merjent reviewed the NDGISHUB Source Water Protection Areas (Community/Non-Community) data; no source water protection areas are located in the Project Corridor. As a result, no impacts are anticipated.
Water sources for organized rural water districts.	No	Merjent reviewed the NDGISHUB Rural Water Districts data. The existing HVDC transmission line spans a portion of the Sheyenne River near Structure 1196, which will be replaced as part of the Project. The location of the span will not change as a result of the Project, and conductor clearance over the Sheyenne River will increase following completion of the Project. Minnesota Power coordinated with the North Dakota Department of Water Resources (NDDWR), which recommended obtaining a Sovereign Lands Permit for documentation purposes. Minnesota Power has submitted the permit application and will continue to coordinate with the NDDWR throughout Project implementation, as appropriate. No impacts to the river and associated water resources are anticipated.
Areas of recreational significance which are not designated as exclusion areas.	No	No recreational areas are known to occur in the Project Corridor. As a result, no impacts are anticipated.

3.0 REFERENCES

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1. U.S. Army Engineer Waterways Experiment Station, Vicksburg, Miss.

Geological, U.S., 2025, *Protected Areas Database of the United States (PAD-US) 4.1 Spatial Analysis and Statistics*: U.S. Geological Survey data release, https://doi.org/10.5066/P96WBCHS. Accessed July 2026.

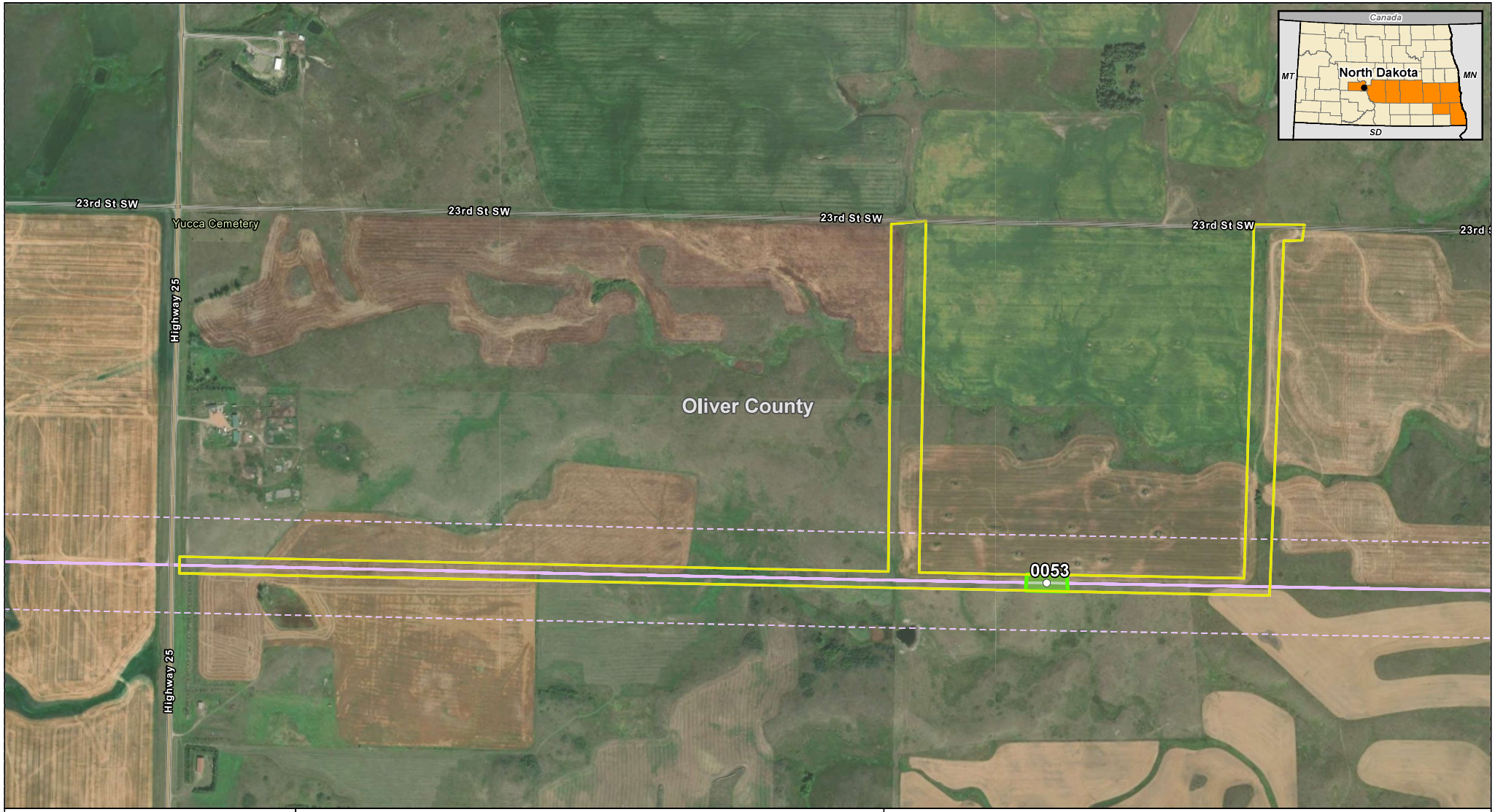
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USACE. 2010. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Great Plains Region (Version 2.0). Ed. J.S. Wakeley, R.W. Lichvar, and C.V. Noble. ERDC/EL TR-10-1. Vicksburg, MS: U.S. Army Engineer Research and Development Center

USFWS. 2026. IPaC Information for Planning and Consultation. Available online at: https://ecos.fws.gov/ipac/. Accessed June 2026.

APPENDIX A
PROJECT FIGURES



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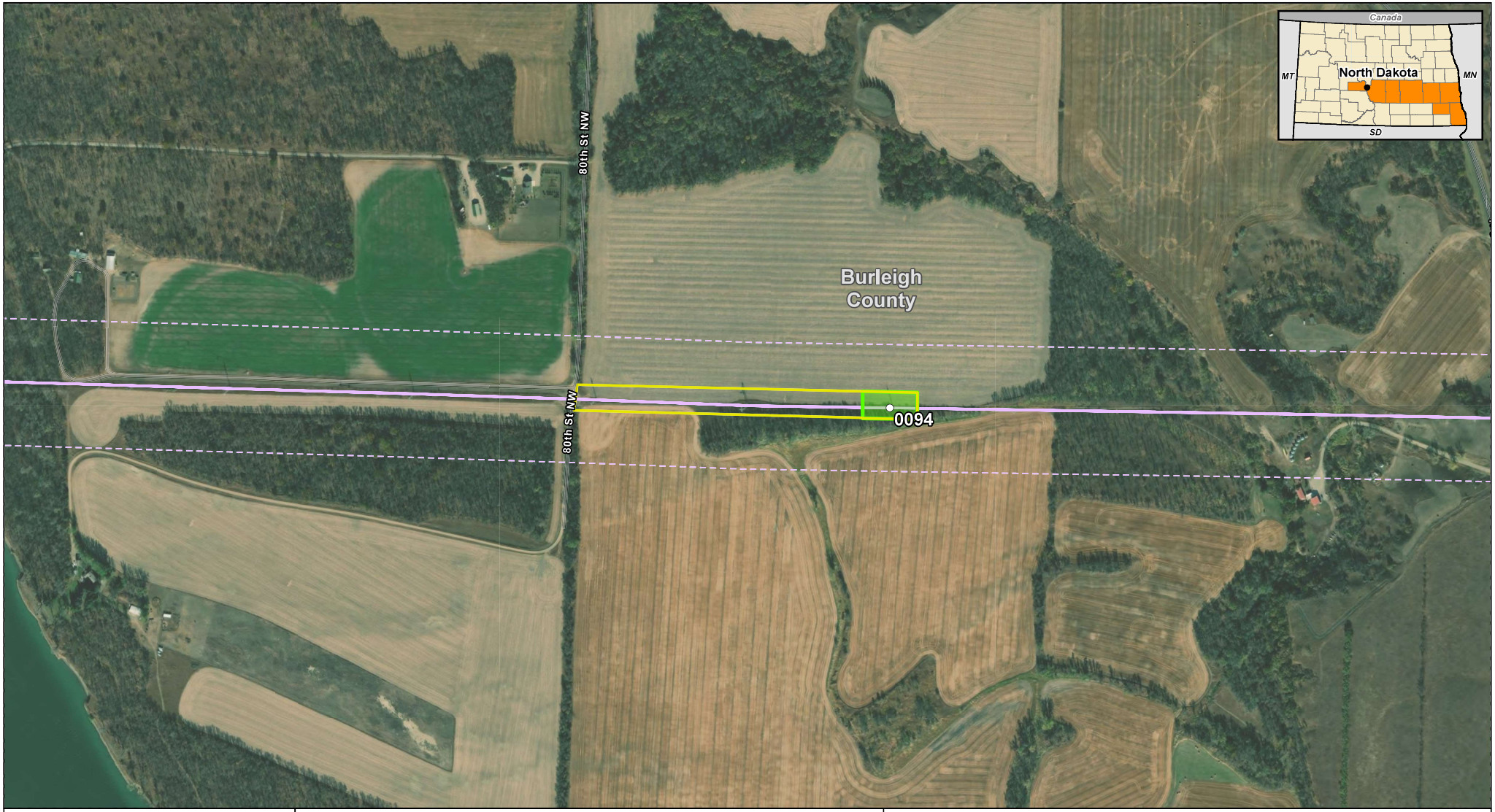
Structure 0053

DC Line Replacement Project
Minnesota Power
Exhibit A
Oliver County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

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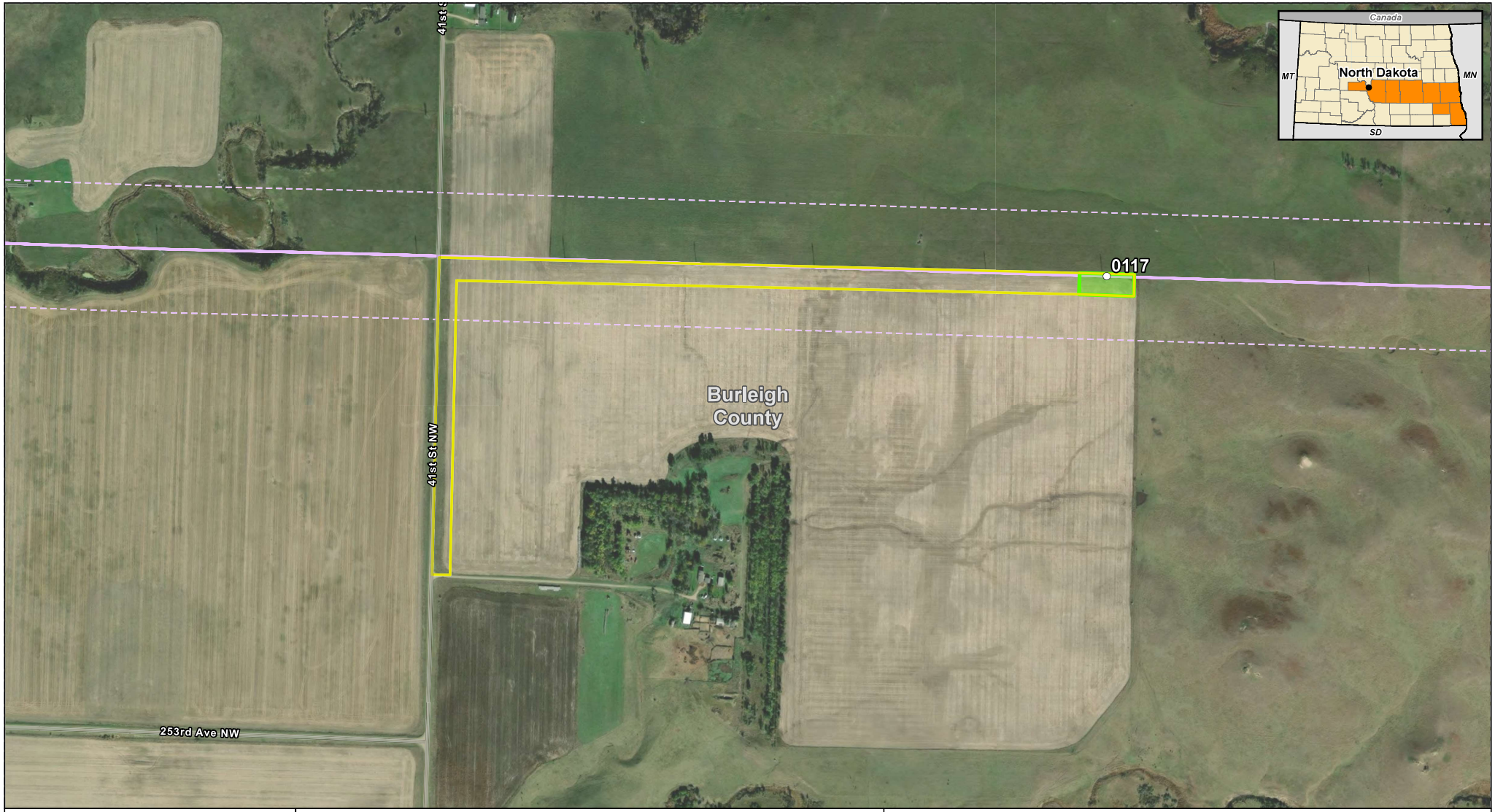
Structure 0094

DC Line Replacement Project
Minnesota Power
Exhibit A
Burleigh County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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Structure 0117

DC Line Replacement Project
Minnesota Power
Exhibit A
Burleigh County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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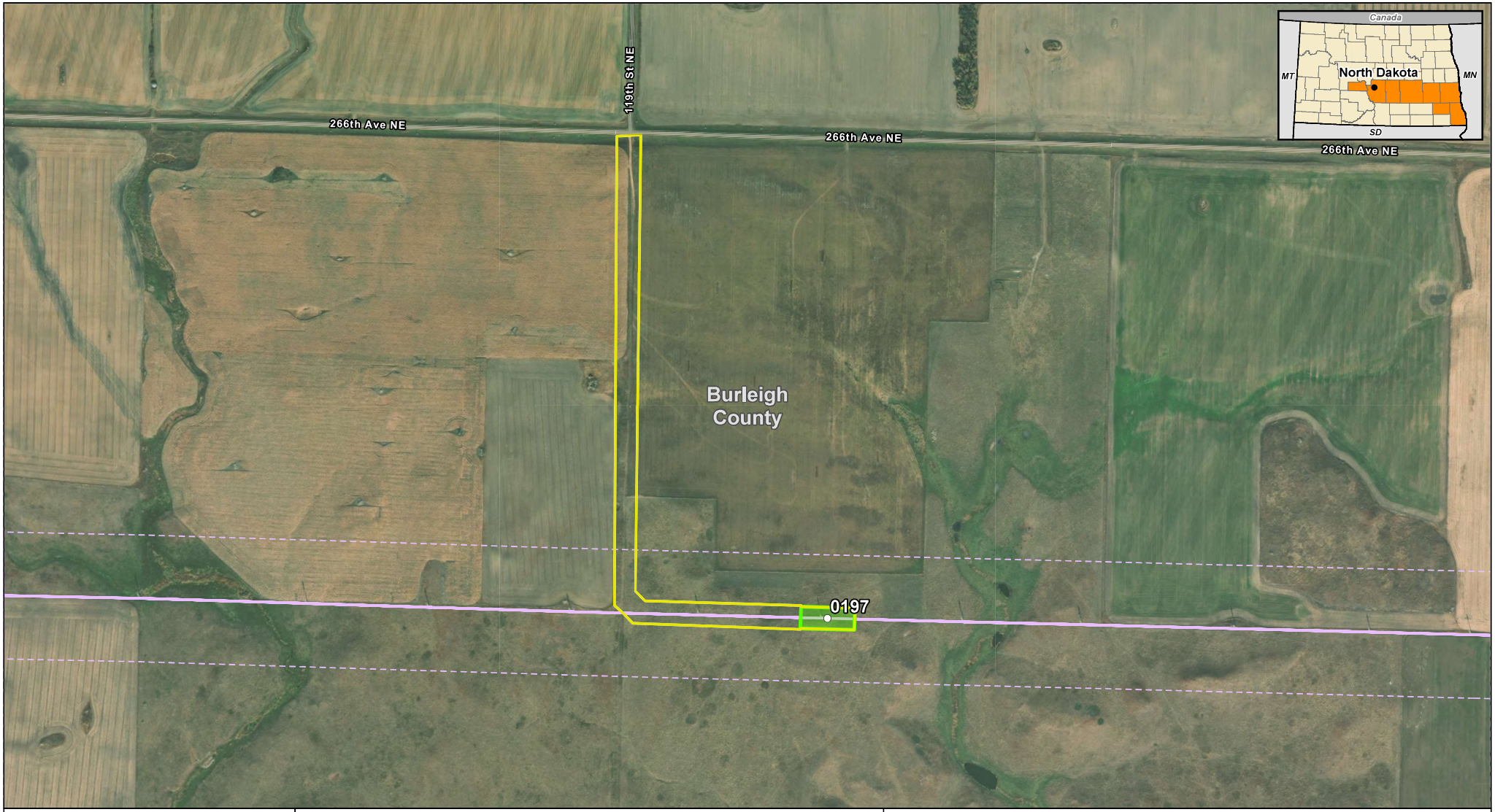
Structure 0147

DC Line Replacement Project
Minnesota Power
Exhibit A
Burleigh County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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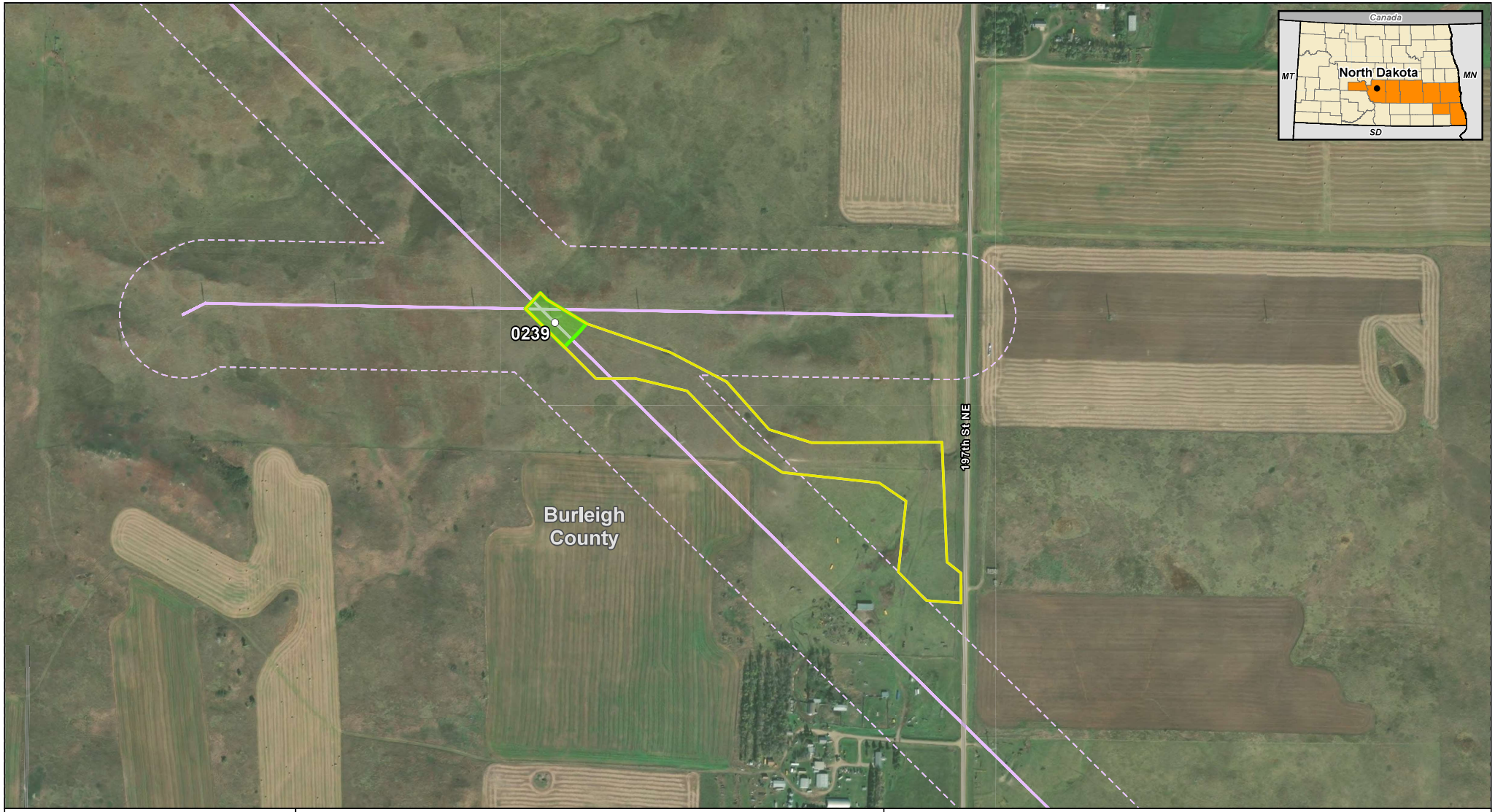
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Structure 0197
DC Line Replacement Project
Minnesota Power
Exhibit A
Burleigh County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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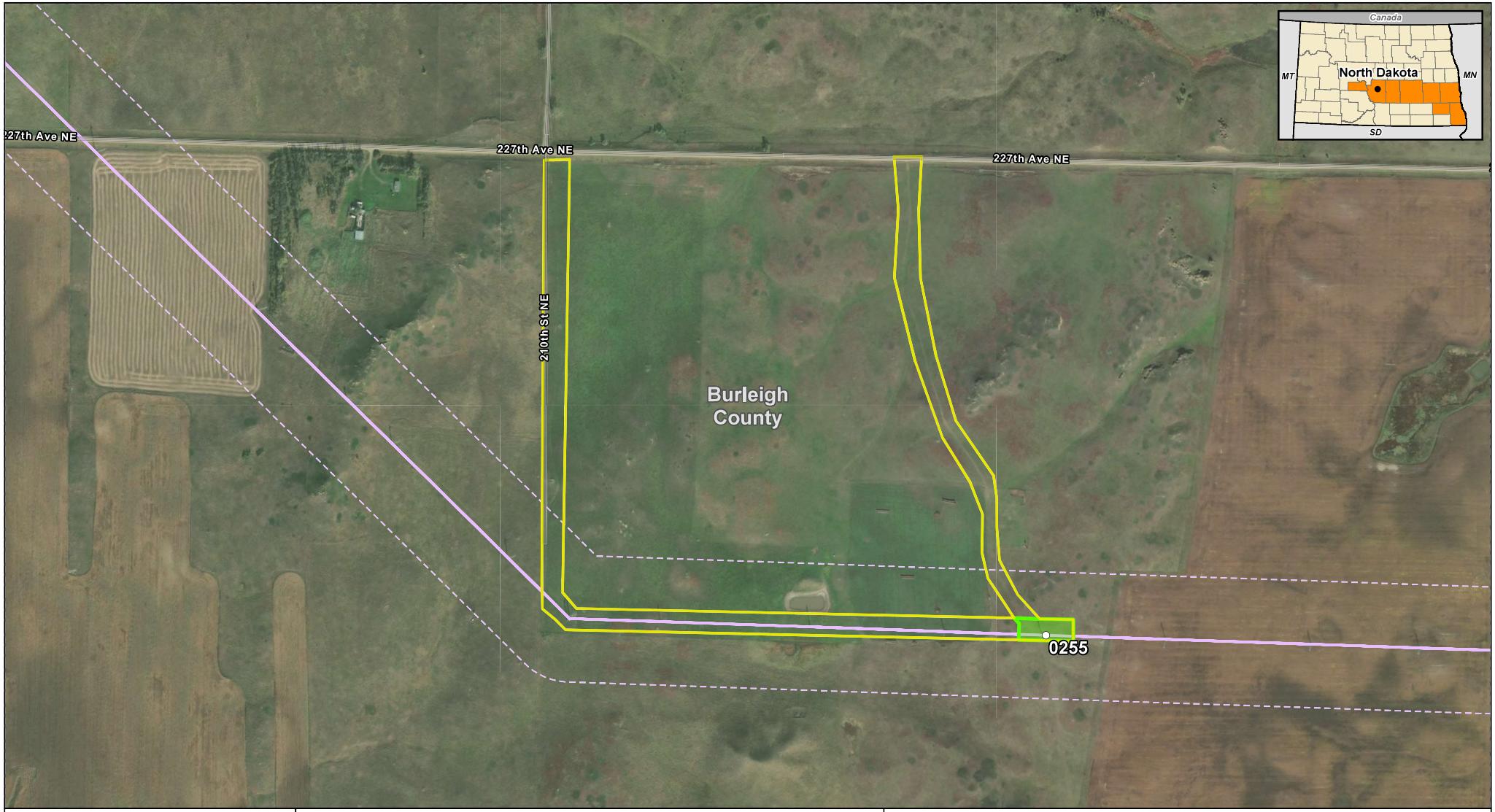
Structure 0239

DC Line Replacement Project
Minnesota Power
Exhibit A
Burleigh County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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Structure 0255

DC Line Replacement Project
Minnesota Power
Exhibit A
Burleigh County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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Structure 0304

DC Line Replacement Project
Minnesota Power
Exhibit A
Burleigh County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

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Structure 0313

DC Line Replacement Project
Minnesota Power
Exhibit A
Burleigh County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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Structure 0486

DC Line Replacement Project
Minnesota Power
Exhibit A
Kidder County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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Structure 0707
DC Line Replacement Project
Minnesota Power
Exhibit A
Stutsman County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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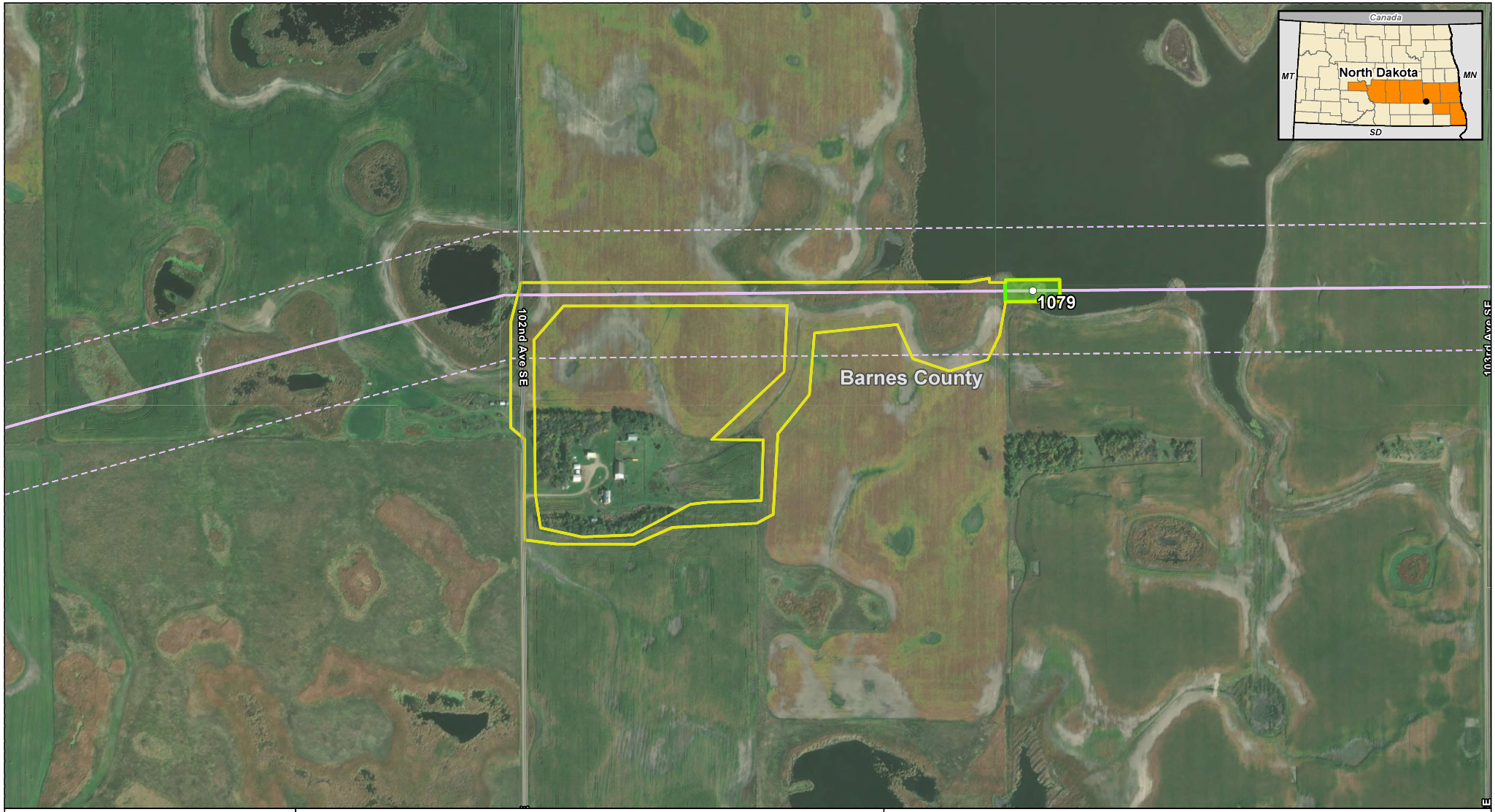
Structure 0816

DC Line Replacement Project
Minnesota Power
Exhibit A
Stutsman County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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Structure 1079
DC Line Replacement Project
Minnesota Power
Exhibit A
Barnes County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

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Structure 1113
DC Line Replacement Project
Minnesota Power
Exhibit A
Barnes County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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Structure 1120

DC Line Replacement Project
Minnesota Power
Exhibit A
Barnes County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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Structure 1196

DC Line Replacement Project
Minnesota Power
Exhibit A
Barnes County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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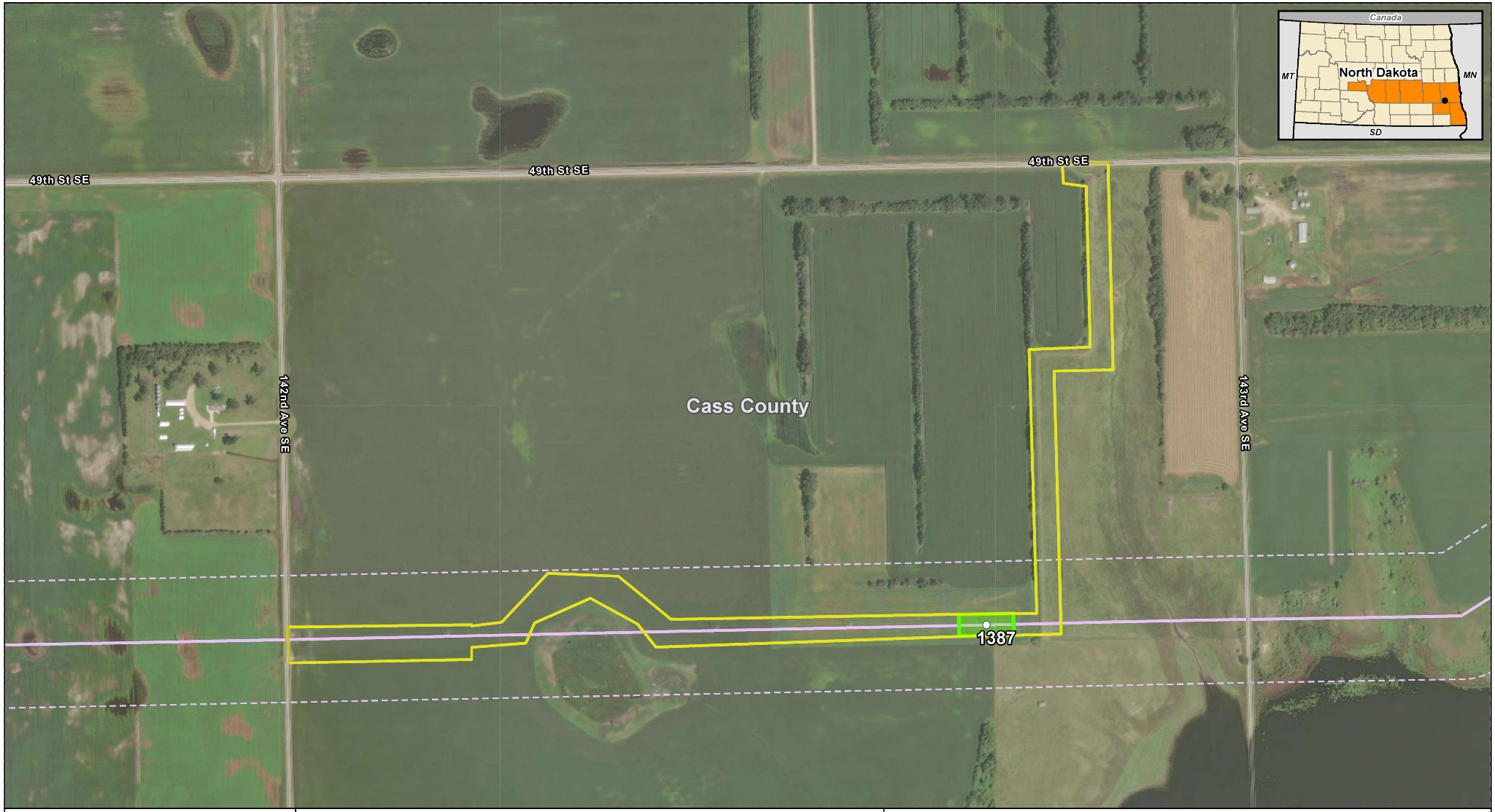
Structure 1346

DC Line Replacement Project
Minnesota Power
Exhibit A
Cass County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

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Date: (7/30/2026)



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For Environmental Review Purposes Only

Structure 1387
DC Line Replacement Project
Minnesota Power
Exhibit A
Cass County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

Structure 1463

DC Line Replacement Project
Minnesota Power
Exhibit A
Ransom County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

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For Environmental Review Purposes Only

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Structure 1485
DC Line Replacement Project
Minnesota Power
Exhibit A
Richland County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

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Structure 1499
DC Line Replacement Project
Minnesota Power
Exhibit A
Richland County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

Source: Z:\Clients\MP_PWR_PowerDC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

Structure 1545

DC Line Replacement Project
Minnesota Power
Exhibit A
Richland County, North Dakota

- Existing Structure
- Structure Workspace
- Temporary Access
- Existing Alignment
- Project Corridor
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

Structure 0053

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Oliver County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



minnesota power
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For Environmental Review Purposes Only

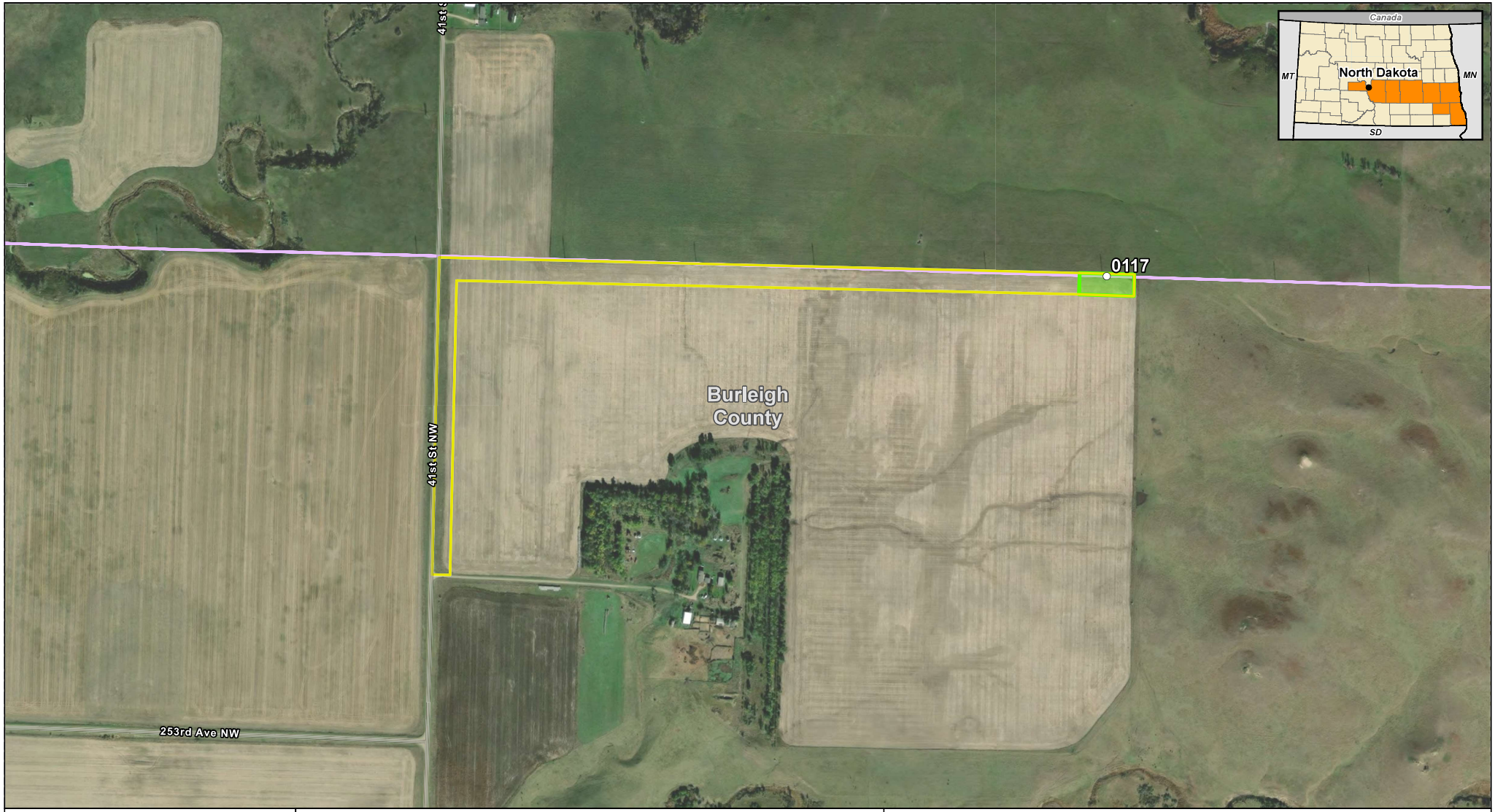
Structure 0094

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Burleigh County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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Structure 0117
DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Burleigh County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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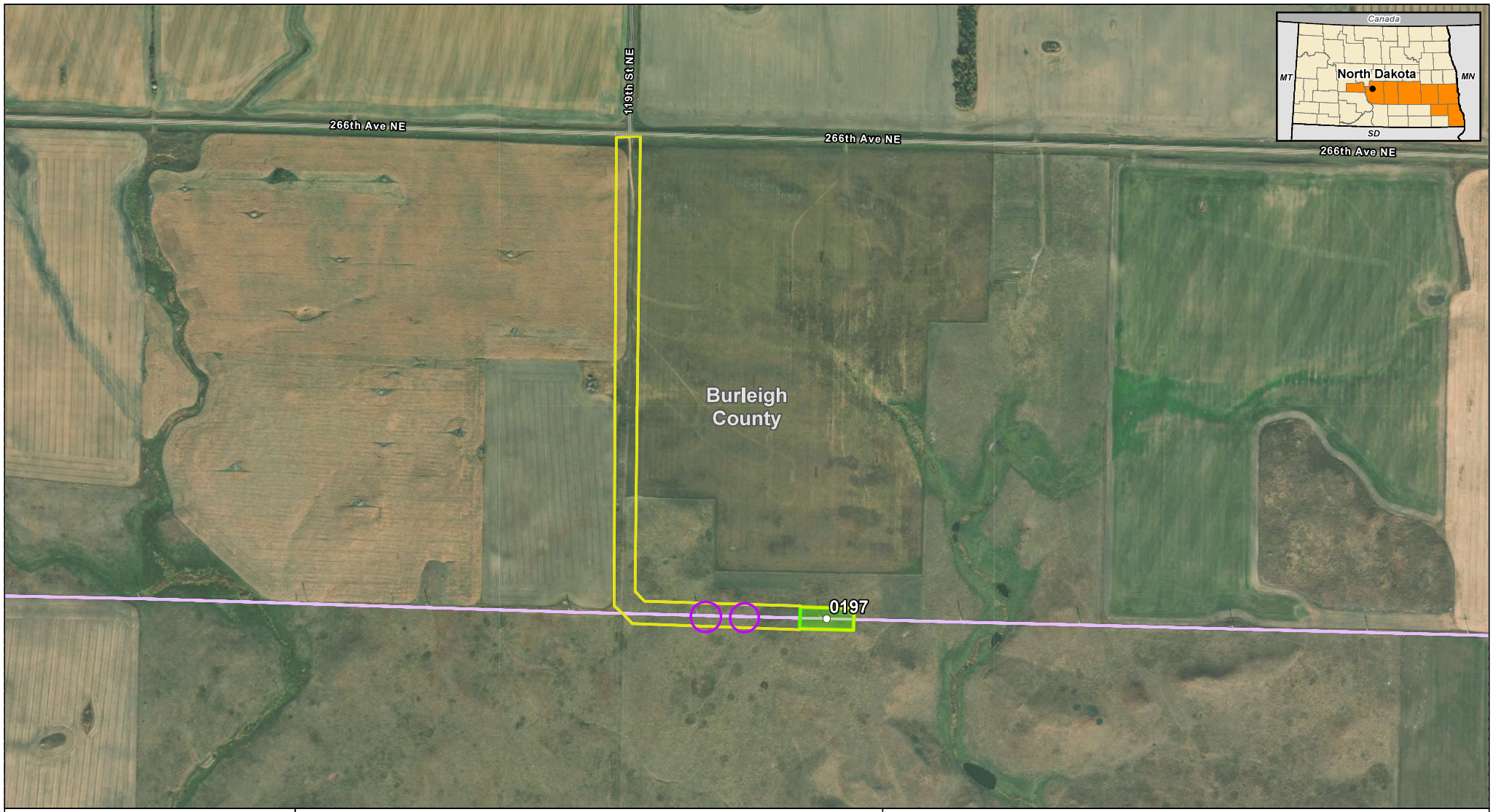
Structure 0147

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Burleigh County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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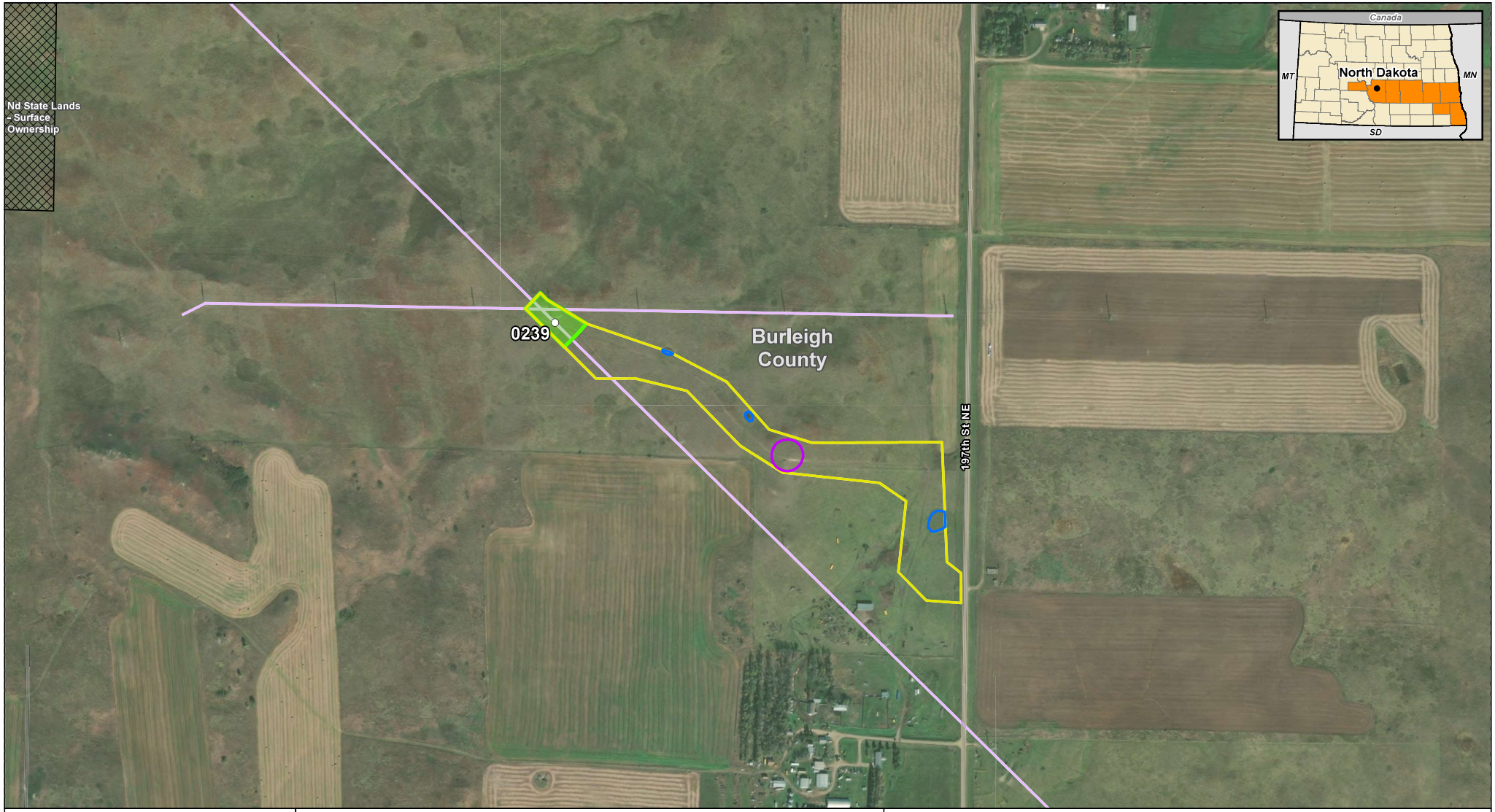
Structure 0197

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Burleigh County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Cultural Avoidance Area

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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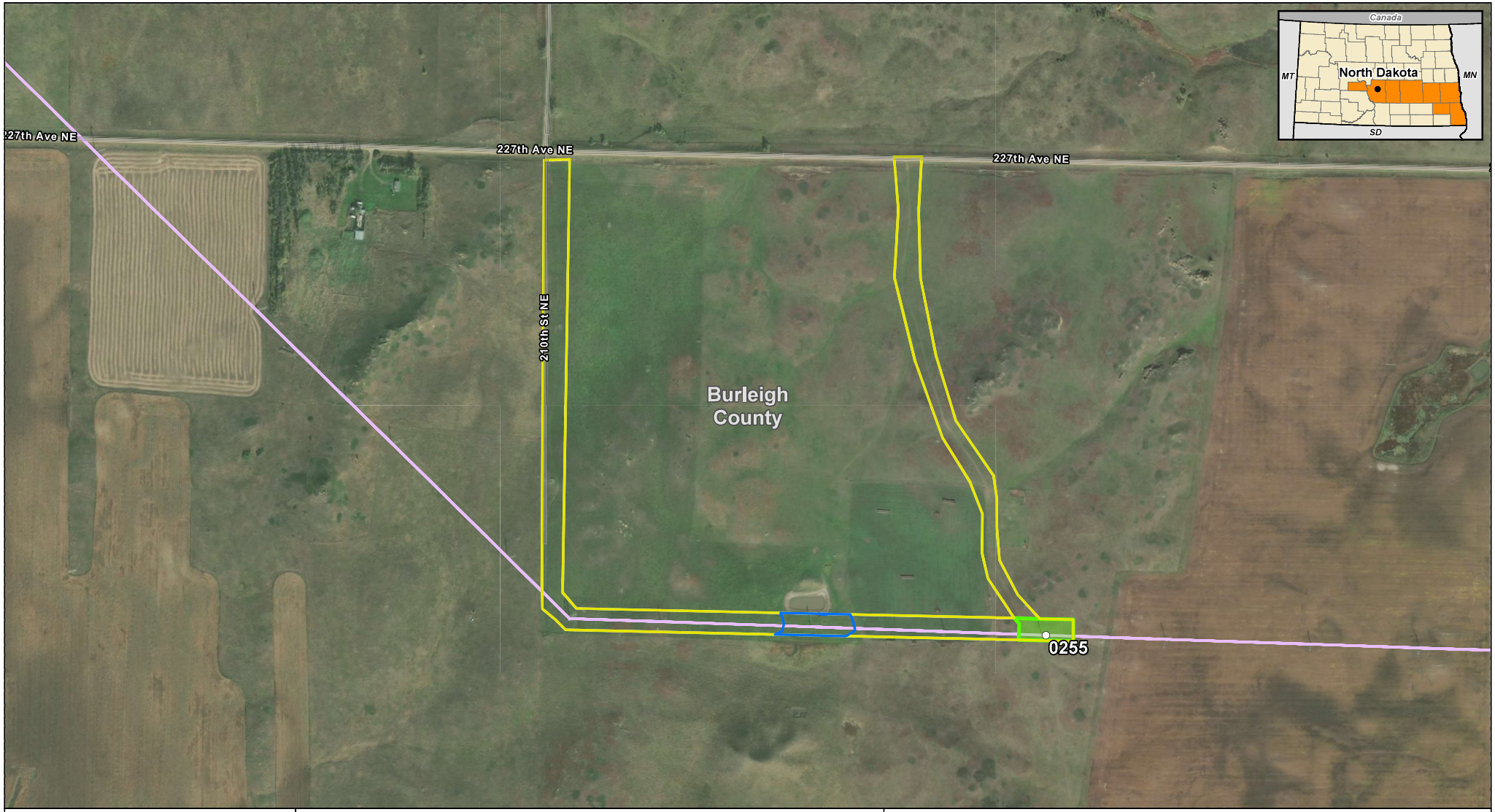
Structure 0239

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Burleigh County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland
- Cultural Avoidance Area
- State Surface Ownership

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

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Structure 0255

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Burleigh County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

Structure 0304

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Burleigh County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland
- State Surface Ownership

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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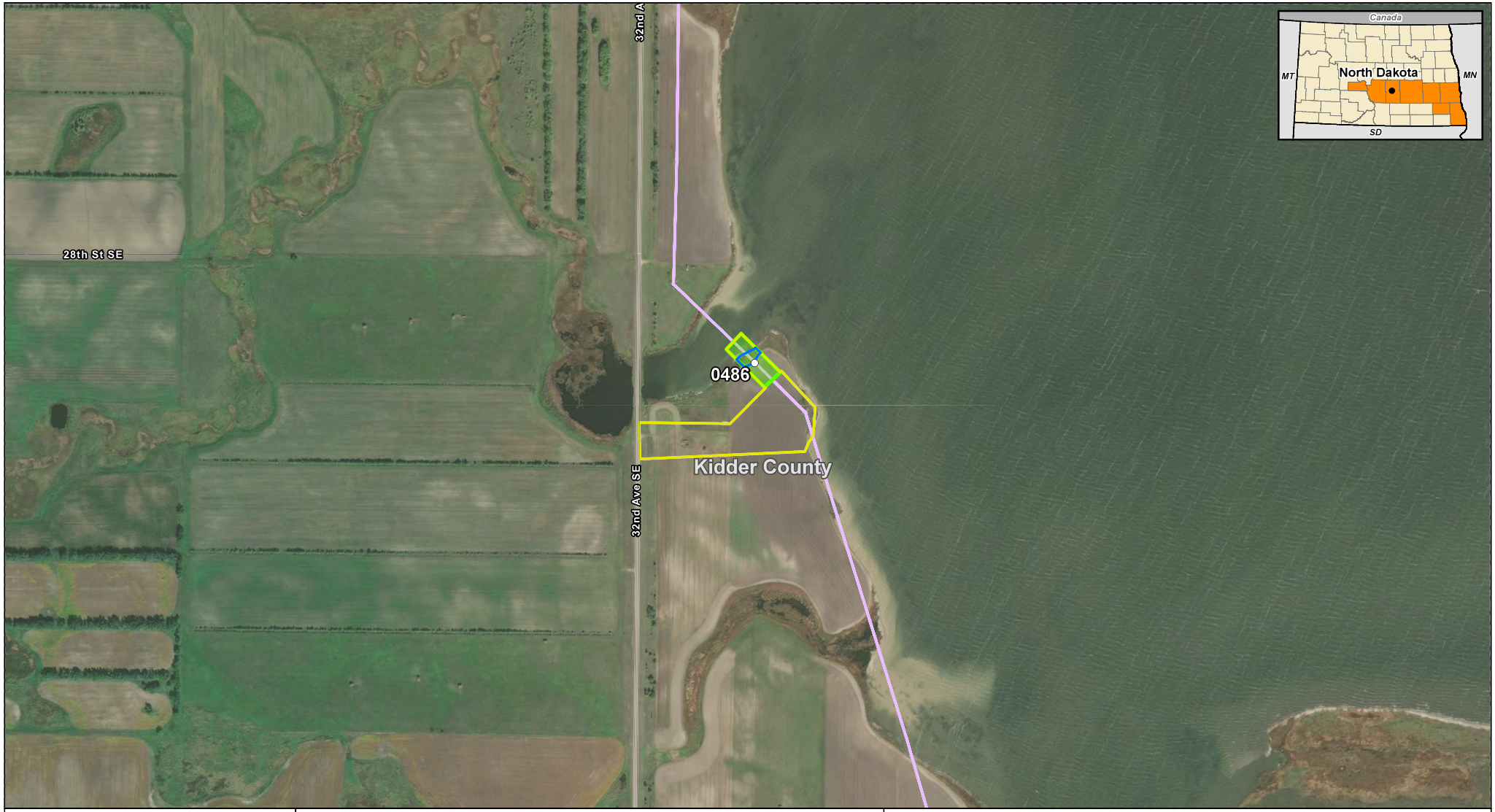
Structure 0313

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Burleigh County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

Structure 0486

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Kidder County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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Structure 0707
DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Stutsman County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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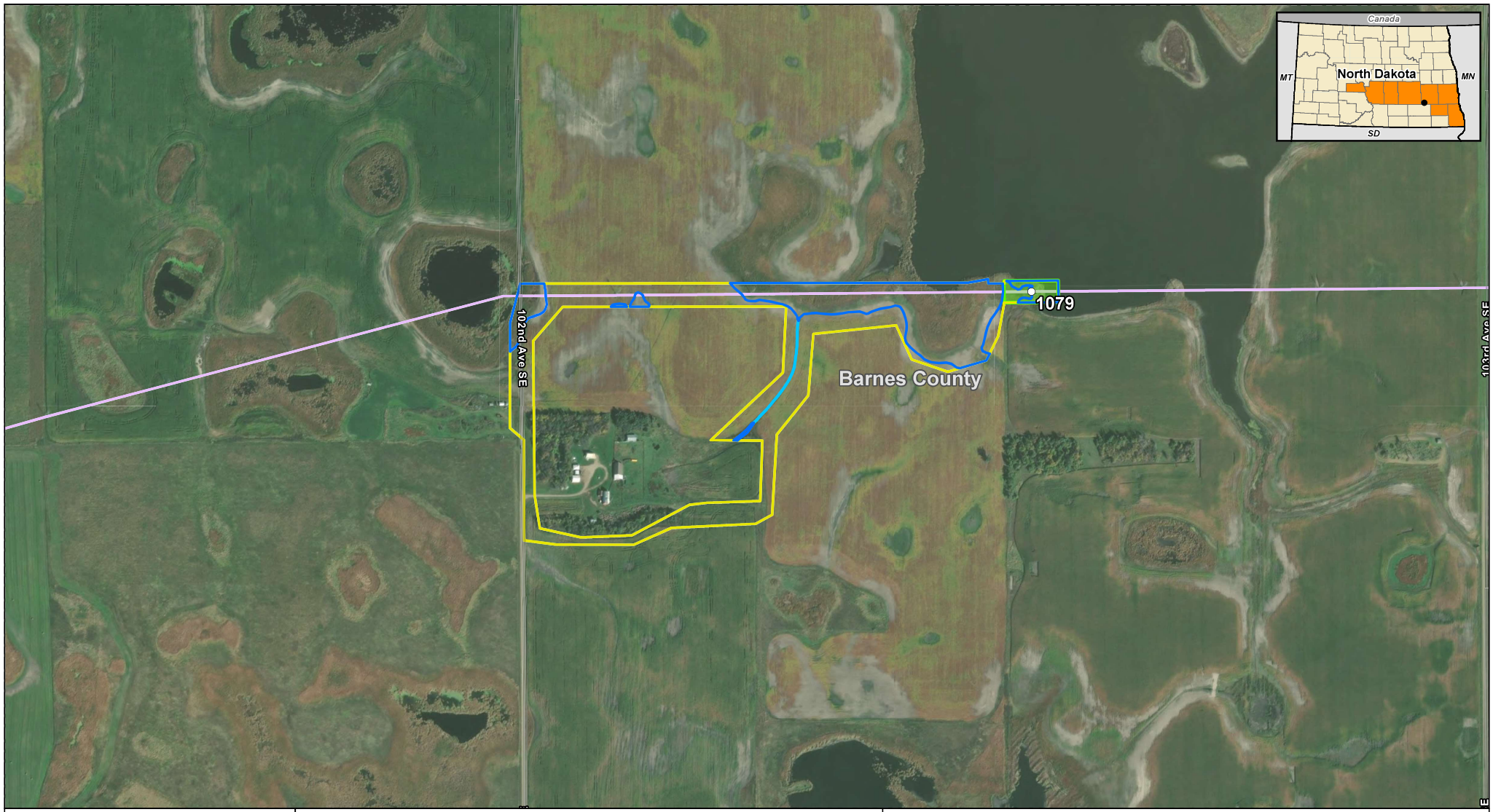
Structure 0816

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Stutsman County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

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Structure 1079

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Barnes County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland
- Delineated Waterway

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

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Structure 1113
DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Barnes County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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AN ALLETE COMPANY

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For Environmental Review Purposes Only

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Structure 1120

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Barnes County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

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Structure 1196

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Barnes County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland
- Delineated Waterway

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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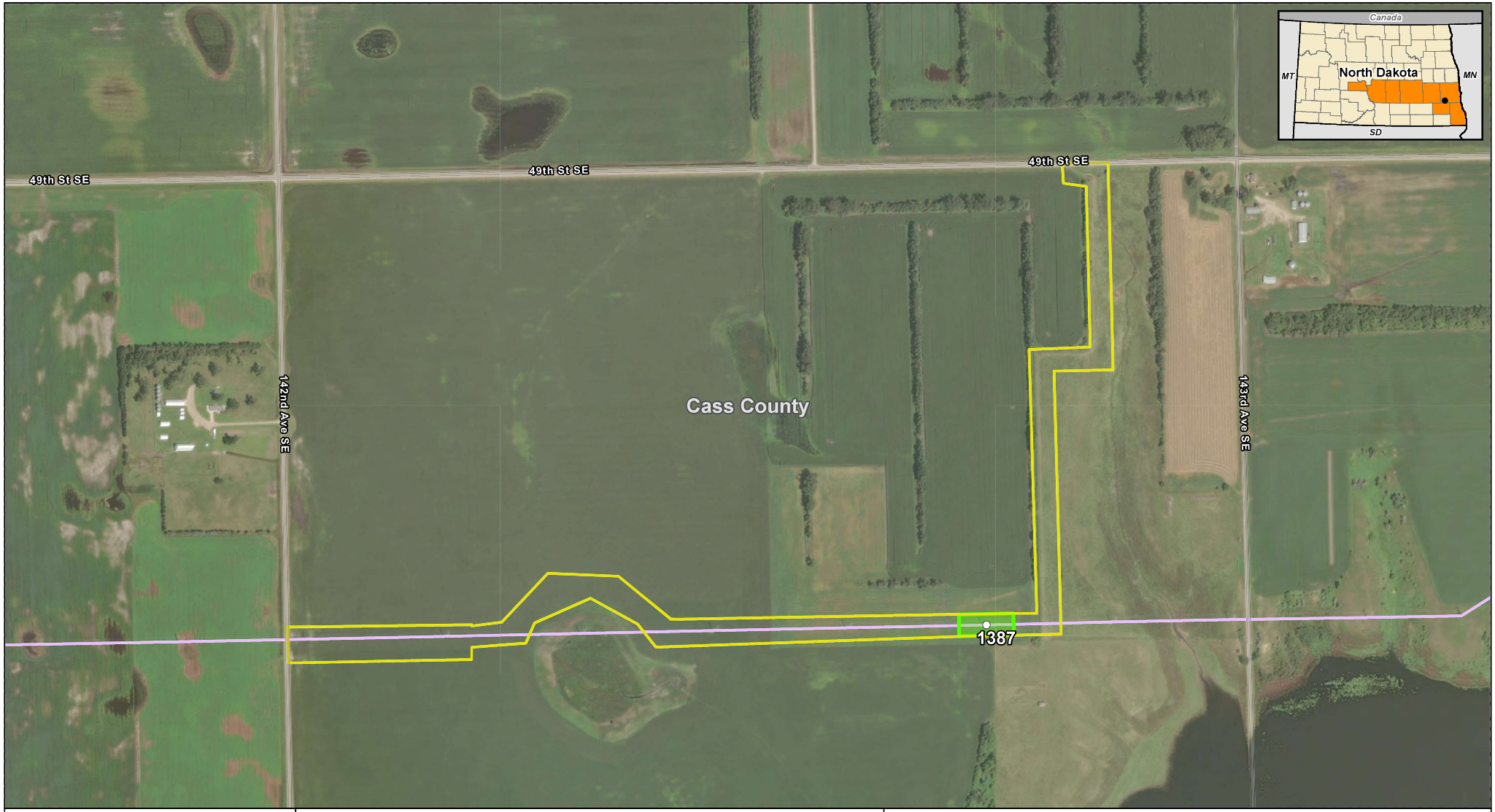
Structure 1346

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Cass County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

Structure 1387
DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Cass County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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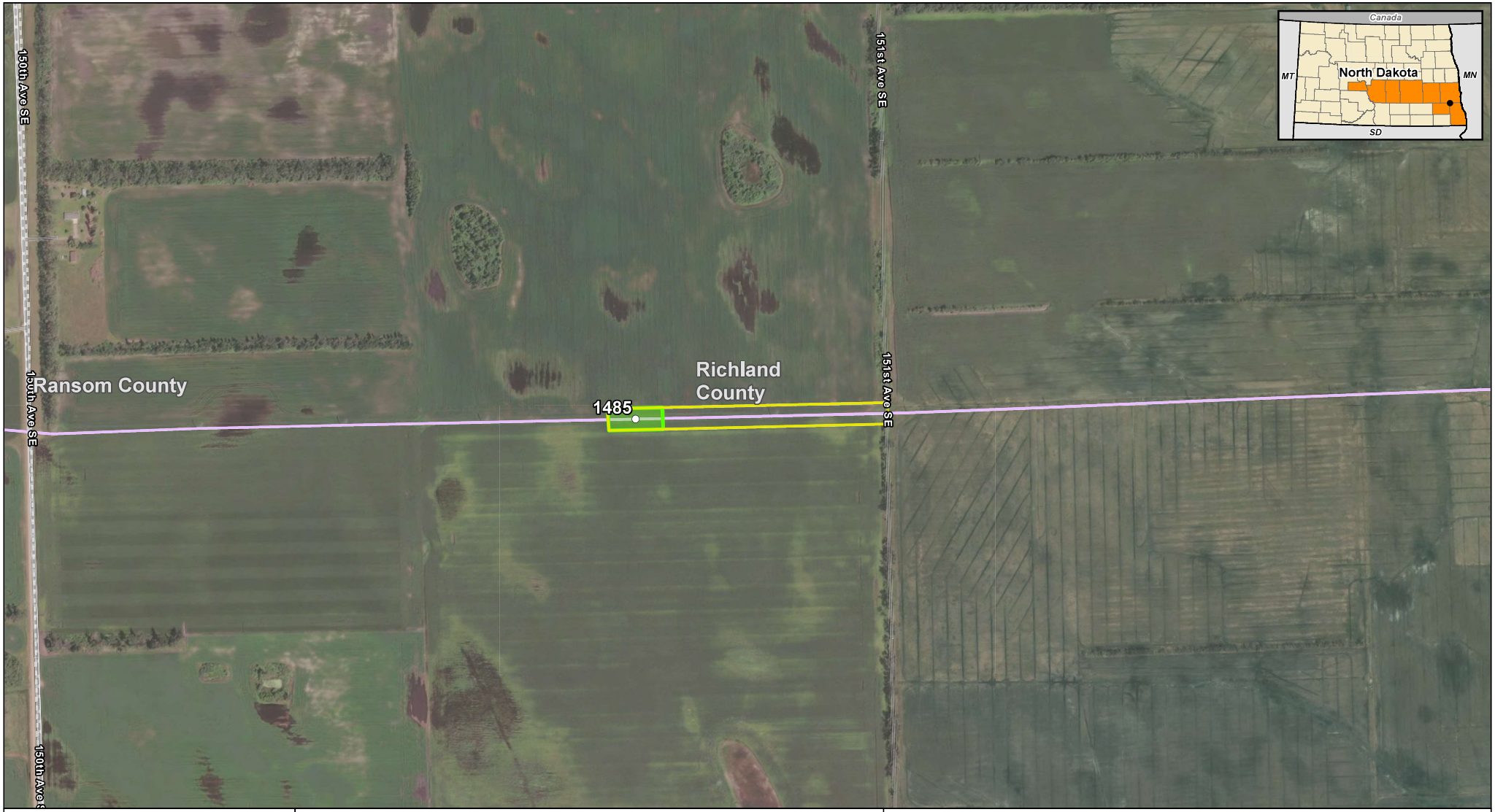
Structure 1463

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Ransom County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary
- Delineated Wetland

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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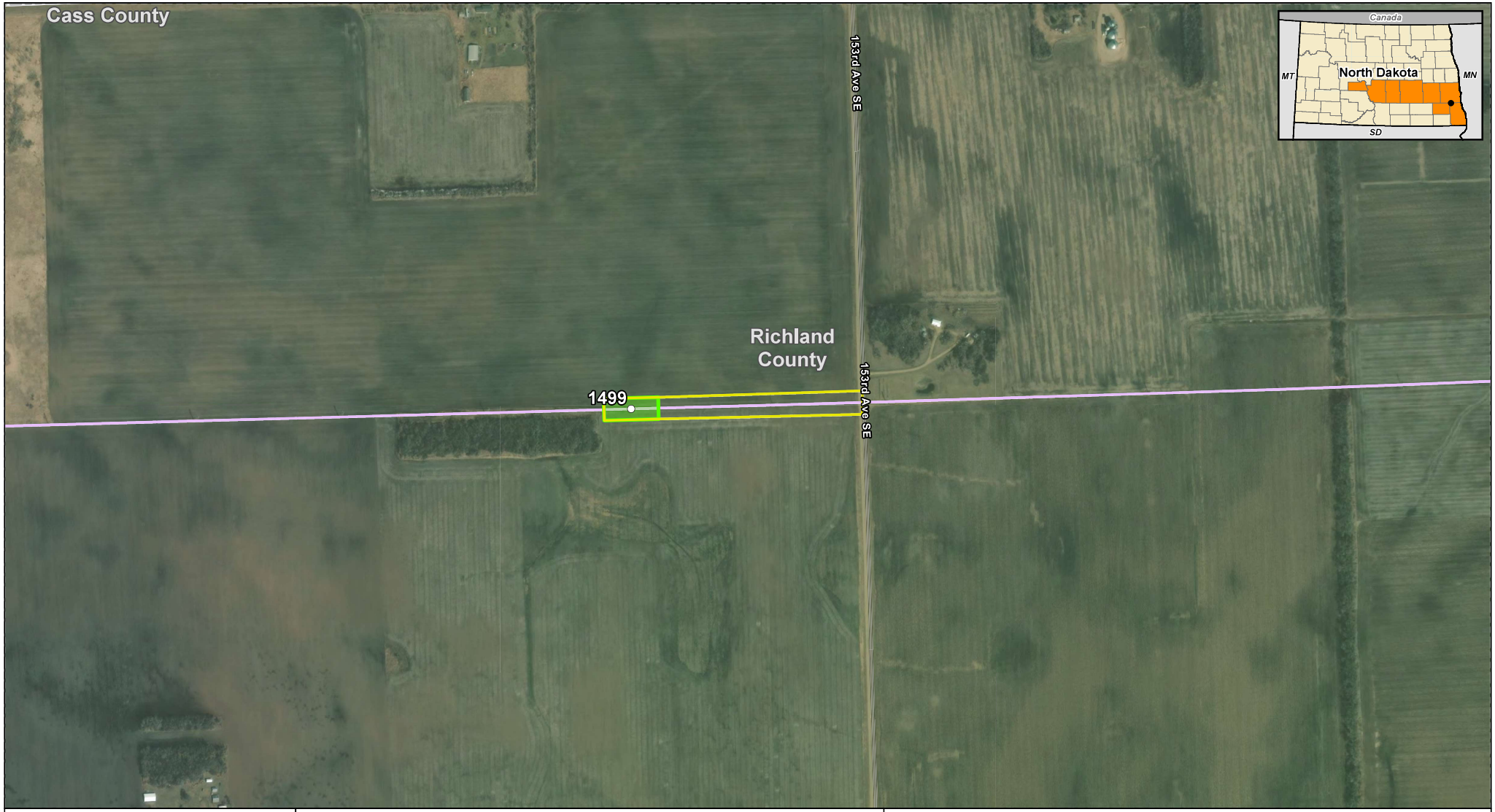
Structure 1485

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Richland County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

Structure 1499

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Richland County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)



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For Environmental Review Purposes Only

Structure 1545

DC Line Replacement Project
Minnesota Power
Exhibit B - Project Plan View
Richland County, North Dakota

- Existing Structure
- Existing Alignment
- Structure Workspace
- Temporary Access
- County Boundary

Source: Z:\Clients\M_P\MN_Power\DC_Line_Replacement\ArcGIS\Permitting\State\PSC_Certificate\DC_Line_PSC_Certificate.aprx

Date: (7/30/2026)

APPENDIX B
AGENCY CONSULTATIONS

United States Department of the Interior

FISH AND WILDLIFE SERVICE
North Dakota Ecological Services Field Office
3425 Miriam Avenue
Bismarck, ND 58501-7926
Phone: (701) 250-4481 Fax: (701) 355-8513

In Reply Refer To: 05/04/2026 14:33:11 UTC
Project Code: 2026-0084798
Project Name: Minnesota Power - DC Line Replacement

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

Section 7 of the Endangered Species Act
The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).
New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.
The Act requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representative) must consult with the Service *if they determine their project and associated actions "may affect" listed species or critical habitat*. If Federal agencies or their non-federal representatives determine their project and associated actions will have "no effect" on listed species, their habitats, or designated critical habitat, consultation is not required. However, if a "no effect" is determined, we recommend that you maintain a written record in support of your conclusion.
Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act
Additionally, while not all are listed as threatened or endangered, eagles and migratory birds

have protections under the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA). The BGEPA prohibits take which is defined as, “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb” (50 CFR 22.3). Disturb is defined in regulations as, “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”. The MBTA makes it unlawful without a waiver to pursue, hunt, take, capture, kill, or sell birds listed as migratory birds, including eagles. The statute does not discriminate between live or dead birds and also grants full protection to any bird parts including feathers, eggs, and nests.

Service Property Interests

As part of the National Wildlife Refuge System, the Service administers fee title Refuge and Waterfowl Production Areas, as well as wetland and grassland easements, throughout North Dakota. For exact locations of Service interest lands, please contact the appropriate Wetland Management Districts (WMD) for guidance regarding FWS easements.

Northwest ND WMD Complex: Kyle Flanery, (701) 768-2548
Eastern ND WMD Complex: Dave Azure, (701) 285-3341
Central ND WMD Complex (also covers south and west): Todd Luke, (701) 442-5474

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

North Dakota Ecological Services Field Office
3425 Miriam Avenue
Bismarck, ND 58501-7926
(701) 250-4481

PROJECT SUMMARY

Project Code: 2026-0084798
Project Name: Minnesota Power - DC Line Replacement
Project Type: Transmission Line - Maintenance/Modification - Above Ground
Project Description: MN Power will be replacing/upgrading ~42 of their structures (poles) along an existing ~230-mile transmission line route.
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@47.047217849999996,-100.29432830610642,14z



Counties: North Dakota

ENDANGERED SPECIES ACT SPECIES

There is a total of 9 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Northern Long-eared Bat *Myotis septentrionalis*	Endangered

No critical habitat has been designated for this species.
Species profile: https://ecos.fws.gov/ecp/species/9045
General project design guidelines:
https://ipac.ecosphere.fws.gov/project/ITASHWNXL5G67BECD6M5SNUEXE/documents/generated/9654.pdf

BIRDS

NAME	STATUS
Piping Plover *Charadrius melodus*	Threatened

Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered.
There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/6039
General project design guidelines:
https://ipac.ecosphere.fws.gov/project/ITASHWNXL5G67BECD6M5SNUEXE/documents/generated/9588.pdf

Rufa Red Knot *Calidris canutus rufa*	Threatened

There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/1864
General project design guidelines:
https://ipac.ecosphere.fws.gov/project/ITASHWNXL5G67BECD6M5SNUEXE/documents/generated/8763.pdf

Whooping Crane *Grus americana*	Endangered

Population: Wherever found, except where listed as an experimental population
There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/758
General project design guidelines:
https://ipac.ecosphere.fws.gov/project/ITASHWNXL5G67BECD6M5SNUEXE/documents/generated/9885.pdf

INSECTS

NAME	STATUS
Dakota Skipper *Hesperia dacotae*	Threatened

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/1028
General project design guidelines:
https://ipac.ecosphere.fws.gov/project/ITASHWNXL5G67BECD6M5SNUEXE/documents/generated/9522.pdf

Monarch Butterfly *Danaus plexippus*	Proposed Threatened

NAME	STATUS
There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	
Suckley's Cuckoo Bumble Bee *Bombus suckleyi* Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10885 General project design guidelines: https://ipac.ecosphere.fws.gov/project/ITASHWNXL5G67BECD6M5SNUEXE/documents/generated/9852.pdf	Proposed Endangered
Western Regal Fritillary *Argynnis idalia occidentalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/12017	Proposed Threatened

FLOWERING PLANTS

NAME	STATUS
Western Prairie Fringed Orchid *Platanthera praeclara* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1669 General project design guidelines: https://ipac.ecosphere.fws.gov/project/ITASHWNXL5G67BECD6M5SNUEXE/documents/generated/9621.pdf	Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

The following FWS National Wildlife Refuge Lands and Fish Hatcheries lie fully or partially within your project area:

FACILITY NAME	ACRES
BARNES COUNTY WATERFOWL PRODUCTION AREA https://www.fws.gov/our-facilities?$keywords="%5C%22BARNES+COUNTY+WATERFOWL+PRODUCTION+AREA%5C%22"	151.914

FACILITY NAME	ACRES
BURLEIGH COUNTY WATERFOWL PRODUCTION AREA https://www.fws.gov/our-facilities?$keywords="%5C%22BURLEIGH+COUNTY+WATERFOWL+PRODUCTION+AREA%5C%22"	0
STUTSMAN COUNTY WATERFOWL PRODUCTION AREA https://www.fws.gov/our-facilities?$keywords="%5C%22STUTSMAN+COUNTY+WATERFOWL+PRODUCTION+AREA%5C%22"	0

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

WETLAND INFORMATION WAS NOT AVAILABLE WHEN THIS SPECIES LIST WAS GENERATED. PLEASE VISIT HTTPS://WWW.FWS.GOV/WETLANDS/DATA/MAPPER.HTML OR CONTACT THE FIELD OFFICE FOR FURTHER INFORMATION.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Hannah Phelps
Address: 1 Main Street SE, Suite 300
City: Minneapolis
State: MN
Zip: 55414
Email hannah.phelps@merjent.com
Phone: 3042761892

NORTH Dakota | Water Resources
Be Legendary.

June. 9, 2026

Ms. Claudia Ciganik

Allete, Inc – Minnesota Power
30 West Superior St.
Duluth, MN 55802
cciganik@mnpower.com
(218) 590-7220

Dear Ms. Ciganik,

This is in response to your request for a review of the environmental impacts associated with the DC Line Structure Upgrade Project, located in Barnes,Burleigh, Cass, Kidder, Oliver, Ransom, Richland, and Stutsman Counties, North Dakota.

The proposed project has been reviewed by Department of Water Resources (DWR), and the following comments are provided:

- There is a FEMA National Flood Insurance Program (NFIP) regulatory floodplain identified or mapped where this proposed project is to take place. Impacted areas are designated to be in NFIP Zone AE, with floodway. The State of North Dakota has no formal NFIP permitting authority, as all NFIP permitting decisions are considered by impacted NFIP participating communities, which is the community with zoning authority for the area in question. Please work directly with the local floodplain administrator of the zoning authority impacted to achieve NFIP and community compliance. Tyler Spomer, NFIP Coordinator, (701) 328-2452, tlspomer@nd.gov.

- The DWR Regulatory Division's Engineering and Permitting Section and Water Resource Districts are responsible for regulating drainage and water management in North Dakota. The DWR Engineering and Permitting Section also regulates the construction and modification of any dike, diversion, restoration, or other device. Consequently, the DWR requests to be notified regarding a proposed project's impacts, if any, to water resources, such as watercourses (i.e. streams or rivers), agricultural surface drains, wetlands (i.e. ponds, sloughs, lakes, or any series thereof) with a contributing watershed area of 80 acres or more, and dikes, diversions, restorations, and other water control

devices, as any modifications, improvements, or impacts may require a drainage permit(s) or construction permit(s). Additionally, construction limits for Structures 1387 and1499 may impact known permitted subsurface water management systems. It is suggested you contact the landowner at each location or Water Resource District of jurisdiction as the permitting authority to confirm if the proposed work will impact these systems. For more information, please visit the Regulation & Appropriation tab on the DWR website (dwr.nd.gov) or contact the Regulatory Division directly at (701) 328-2750 or dwrregpermits@nd.gov.

- Any work within, including projects that span over and bored under, the ordinary high water mark (OHWM) of a North Dakota navigable waterbody requires prior authorization from DWR. Depending on the scope and method of maintenance or new work conducted on the transmission line structure that may take place on the Sheyenne River, a Sovereign Land permit from DWR would be required. For more information, feel free to contact DWR's Sovereign Land Manager, Amy Winkelman at (701) 328-4935 or awinkelman@nd.gov. You can also contact our Sovereign Land Specialist at (701) 328-4988 or tbthyberg@nd.gov. This comment pertains primarily to Structure 1196.

- Initial review indicates the project does not require a conditional or temporary permit for water appropriation. However, if surface water or groundwater will be diverted for construction of any future projects identified in the plan, a water permit will be required per North Dakota Century Code § 61-04-02. Please consult with the DWR Water Appropriation Division if you have any questions at (701) 328-2754 or appropinfo@nd.gov.

- The DWR maintains a network of observation wells across the state for monitoring the water levels and quality in glacial and bedrock aquifers. These wells are often installed in road and highway rights-of-way to limit inconvenience to the adjacent landowners. DWR observation wells have a yellow protective casing extending between 1 and 3 feet above ground surface, and their locations are marked with a stake. If an observation well is encountered during project activities and must be removed, please contact the Water Appropriation Division. The DWR hopes to keep all observation wells, but otherwise will ensure the well is properly abandoned.

Thank you for the opportunity to provide review comments. Should you have further questions, please contact me at (701) 328-4970 or kyrkoski@nd.gov.

Sincerely,

Kyle Yrkoski
Planner III

KY:mg/1570

Outlook

Re: [EXTERNAL MAIL] Re: [EXTERNAL] Re: [EXTERNAL MAIL] DC Line Structure Upgrade Project

---

From Claudia Ciganik (MP) <cciganik@mnpower.com>
Date Thu 5/21/2026 3:40 PM
To McKenzie, Chelsie J <cmckenzie@blm.gov>

Chelsie,

Thank you for your review and response. We appreciate your time and your confirmation that BLM has no concerns with the project.

Best,

Claudia Ciganik
Environmental Compliance Specialist I
Minnesota Power, Environmental & Land Management
C: 218-590-7220

From: McKenzie, Chelsie J <cmckenzie@blm.gov>
Sent: Thursday, May 21, 2026 1:55 PM
To: Claudia Ciganik (MP) <cciganik@mnpower.com>
Subject: [EXTERNAL MAIL] Re: [EXTERNAL] Re: [EXTERNAL MAIL] DC Line Structure Upgrade Project

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Claudia,

Thank you for getting me the KMZ file. I had a chance to review it today, and there doesn't appear to be any BLM managed lands involved. The BLM has no concerns for this project.

Chelsie McKenzie
Realty Specialist
Bureau of Land Management
North Dakota Field Office

99 23rd Avenue West, Suite A
Dickinson, ND 58601
Office: 701-227-7702
Cell: 701-502-1271

From: Claudia Ciganik (MP) <cciganik@mnpower.com>
Sent: Tuesday, May 19, 2026 1:47 PM
To: McKenzie, Chelsie J <cmckenzie@blm.gov>
Subject: [EXTERNAL] Re: [EXTERNAL MAIL] DC Line Structure Upgrade Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi Chelsie,

Please see the attached KMZ file containing the structure locations and construction limits.

Let me know if you have any additional questions.

Thank you,

Claudia Ciganik
Environmental Compliance Specialist I
Minnesota Power, Environmental & Land Management
C: 218-590-7220

From: McKenzie, Chelsie J <cmckenzie@blm.gov>
Sent: Monday, May 18, 2026 5:26 PM
To: Claudia Ciganik (MP) <cciganik@mnpower.com>
Subject: [EXTERNAL MAIL] DC Line Structure Upgrade Project

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Claudia,

I received an agency review request regarding the DC Line Structure Upgrade Project; I was just wondering if you had a KMZ file or legal land descriptions of the project.

Thank you

Chelsie McKenzie
Realty Specialist
Bureau of Land Management
North Dakota Field Office
99 23rd Avenue West, Suite A
Dickinson, ND 58601
Office: 701-227-7702
Cell: 701-502-1271

Outlook

RE: [EXTERNAL MAIL] DC Line Structure Upgrade

From Vigesaa, Claire <cvigesaa@nd.gov>
Date Wed 5/27/2026 10:58 AM
To Claudia Ciganik (MP) <cciganik@mnpower.com>
Cc Cheryl Froelich (BNI Energy) <cfroelich@bnienergy.com>

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Thank you Claudia, this is helpful.

Claire Vigesaa, Executive Director
North Dakota Transmission Authority
406-489-3881

From: Claudia Ciganik (MP) <cciganik@mnpower.com>
Sent: Tuesday, May 26, 2026 3:27 PM
To: Vigesaa, Claire <cvigesaa@nd.gov>
Cc: Cheryl Froelich (BNI Energy) <cfroelich@bnienergy.com>
Subject: Re: [EXTERNAL MAIL] DC Line Structure Upgrade

***** **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Hi Claire,

Thanks for taking a look at the notice and for your support.

Happy to provide a bit more context on the “how” and “why.”

Why:

The upgrades are part of a broader effort to modernize aging HVDC infrastructure and maintain long-term system reliability. Some of the existing structures are approaching the end of their service life, and these replacements help ensure continued safe and reliable operation of the line.

In some cases, replacement structures may be taller to maintain clearance requirements and align with updated design standards. These upgrades also support system improvements associated with the broader HVDC modernization project.

How:

The work generally involves replacing select existing structures with new structures near their current locations. In most cases, we plan to:

- Remove the existing structure
- Install a new structure as close as practicable to the existing structure
- Access structures using existing easements where possible, and coordinate with landowners where off-easement access is needed to minimize impacts and respect landowner rights

We're aiming to keep impacts as localized as practicable by working within the existing right-of-way and limiting new disturbance wherever possible.

Please let me know if you have any follow-up questions. I'm happy to discuss further or set up a call if that's helpful.

Thank you,

Claudia Ciganik
Environmental Compliance Specialist I
Minnesota Power, Environmental & Land Management
C: 218-590-7220

From: Vigesaa, Claire <cvigesaa@nd.gov>
Sent: Wednesday, May 20, 2026 8:52 AM
To: Claudia Ciganik (MP) <cciganik@mnpower.com>
Cc: Cheryl Froelich (BNI Energy) <cfroelich@bnienergy.com>
Subject: [EXTERNAL MAIL] DC Line Structure Upgrade

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Claudia,

I received the notice/maps of your proposed HVDC Structure upgrades in North Dakota. We are supportive of your modernization project and the related structure upgrade. It would be helpful if you could share a little more detail on the "how" and "why" so that I can be well equipped to support the work and answer questions that may come to me.

Feel free to answer by email or call if that is more convenient.

Thanks,

Claire

Claire Vigesaa, Executive Director
North Dakota Transmission Authority
406-489-3881

NORTH Dakota | Transportation
Be Legendary.

May 22, 2026

Claudia Ciganik
Environmental Compliance Specialist 1
ALLETE, Inc – Minnesota Power
30 West Superior St.
Duluth, MN 55802

Dear Ms. Ciganik:

SUBJECT: DC-Line-Structure-Upgrade-Project

We have reviewed your May 15, 2026 letter and offer the following comments.

This project should have no adverse effect on the North Dakota Department of Transportation highways.

If the project requires any work to be done on highway right of way, it will be necessary to obtain the appropriate permits and risk management documents from the appropriate Department of Transportation District Engineer:

Any Utility line work performed on NDDOT highway right of way will require following the conditions of any current utility permit or applying for a new NDDOT Utility Permit from the NDDOT's District Office. Please contact the appropriate Department of Transportation District Engineer.

Bismarck District- Larry Gangl at 701-328-6955
Valley City District- Jay Praska at 701-845-8816
Fargo District- Aaron Murra at 701-239-8974

Sincerely,

Jon Ketterling, P.E.
Director – Office of Project Development

57/jk/mv
Enclosure
C: Larry Gangl, Bismarck District Engineer
Jay Praska, Valley City District Engineer
Aaron Murra, Fargo District Engineer

Outlook

[EXTERNAL MAIL] RE: Request for Review: DC Line 33 Structures Upgrade Project: NDGS Comments

From Anderson, Fred J. <fjanderson@nd.gov>
Date Tue 6/2/2026 1:43 PM
To Claudia Ciganik (MP) <cciganik@mnpower.com>

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Dear Ms. Ciganik

The NDGS appreciates the opportunity to review and provide comment on this proposed electrical transmission upgrade project.

We compared the locations of the 33 structures proposed for upgrade, included in the May 15, 2026 comment solicitation letter, against recently completed geologic mapping work in the area and did not note any geologic concerns with these locations.

All our geologic mapping work products (maps, shapefiles, etc.) can be found on our website https://www.dmr.nd.gov/dmr/ndgs for your use in continued design and route planning work if needed.

Please let us know if there are any questions or comments regarding this review.

Regards,

Fred J. Anderson
Surface Geology Section Manager

701.328.8000 • fjanderson@nd.gov

NORTH Dakota Be Legendary. | Geological Survey MINERAL RESOURCES

www.dmr.nd.gov • 600 E Boulevard Ave, Dept. 474 • Bismarck, ND 58505

USDA
United States Department of Agriculture

Natural Resources
Conservation Service

Bismarck State Office
PO Box 1458
Bismarck, ND
58502-1458

Voice 701.530.2000
Fax 855-813-7556

May 27, 2026

Claudia Ciganik
ALLETE, Inc. Minnesota Power
30 West Superior St.
Duluth, MN 55802

Dear Ms. Ciganik:

The Natural Resources Conservation Service (NRCS) has reviewed your letter dated May 15, 2026, concerning DC Line Structure Upgrade Project in Barnes, Burleigh, Cass, Kidder, Oliver, Ransom, Richland, and Stutsman Counties, North Dakota.

NRCS has a major responsibility with the Farmland Protection Policy Act (FPPA) in documenting conversion of farmland (i.e., Prime, Statewide Importance and/or Local Importance) to non-agricultural use when federal funding is used. Your project is a proposed upgrade of current structures of an existing +/-250 kV High Voltage Direct Current Transmission Line where an easement was previously acquired for the original transmission line build. Projects are exempted from FPPA on land where easements were acquired prior to August 4, 1984; therefore, no further action is needed.

If you have additional questions pertaining to FPPA, please contact Lance Duey, Assistant State Soil Scientist, NRCS, Bismarck, North Dakota, at (701) 530-2109.

JORDAAN THOMPSON LARSON

Digitally signed by JORDAAN THOMPSON LARSON
Date: 2026.05.29 09:39:46 -05'00'

JORDAAN THOMPSON LARSON
Acting State Soil Scientist

USDA is an equal opportunity provider, employer, and lender.

APPENDIX C
DAKOTA SKIPPER
SURVEY REPORT

MIDWEST NATURAL RESOURCES

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

July 30, 2026

Ms. Bohnenblust,

Midwest Natural Resources, Inc. (MNR) is pleased to provide the following Dakota skipper (*Hesperia dacotae*) assessment report for the federally listed Dakota skipper in support of Minnesota Power's proposed DC Line Structure Upgrade Project, located roughly between Bismarck and Fargo in Barnes, Burleigh, Cass, Kidder, Oliver, Ransom, Richland, and Stutsman Counties, North Dakota (**Figure 1; Appendix A – Map 1**).

The initial effort involved conducting a desktop assessment of the entire route to determine the potential for native, untilled grasslands that could support Dakota skippers, and this effort was followed by field surveys of all sites identified during the desktop assessment. Lastly, occupancy surveys were conducted where these habitats were determined to be unavoidable.



Figure 1. Project Location with Desktop Delineated Areas (symbolized in red)

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, specifically the 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 with minimal topographic relief, and are unlikely to be present where the proposed route is located.

Type B habitat has the potential to be found throughout the proposed route, and the 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 an 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.

METHODS

Prior to the field habitat assessment/delineation efforts, MNR conducted a preliminary grassland desktop analysis using Geographic Information Systems (GIS) to identify potential grassland habitat on the Project. This initial analysis utilized publicly available land cover data, including the National Agricultural Imagery Program (NAIP) 2025 aerial imagery, the National Land Cover Dataset, the National Agricultural Statistics Service Cropland Data Layer, and aerial and infrared imagery.

Field surveys evaluating the suitability of the delineated areas for Dakota skipper habitat were conducted in October 2025 and May 2026, and habitat polygon boundaries were refined where necessary. The quality of each habitat polygon was evaluated during field efforts based on the presence of larval-host and nectar plant species. Habitat characteristics including cover of native graminoid, native forb, non-native herbaceous species, and woody plants, as well as the presence/absence of requisite prairie species, were recorded.

RESULTS

In all, fifteen locations with potential Dakota skipper habitat were delineated during the desktop assessment (**Appendix A – Maps 2-29**). Field evaluations reduced the potential habitat to five polygons totaling 0.48 acres across two structure replacement sites, all located in Burleigh County (**Appendix A – Maps 30-31**). Two of the polygons were associated with structure 53 and three areas associated with structure 239. However, following communication with Merjent, the habitat areas associated with structure 0053 were avoidable, leaving only the habitat areas associated with structure 0239 requiring occupancy surveys.

The field-delineated habitat areas associated with structure 0239 were surveyed for occupancy three separate times between July 3-8, 2026. Survey efforts were led by Otto Gockman 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. Each surveyor's route was recorded during the entirety of the three survey visits (**Appendix A – Map 32**). Additionally, as part of the documentation process, all butterfly species/individuals encountered were recorded. Whenever possible,

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

these were identified to species; at times it was not possible to determine the species for butterflies on the wing, and in these cases the observation was recorded to the lowest taxonomic grouping possible.

RESULTS

In all, approximately 15 different butterfly species were observed, with certain individuals identified to broader groups (**Table 1; Appendix B**). No Dakota skippers were observed during the surveys. However, two species currently in consideration for federal listing, monarch (*Danaus plexippus*) and regal fritillary (*Speyeria idalia*), were observed.

Table 1. Observed Species

Common Name	Scientific Name	Count
Black Swallowtail	*Papilio polyxenes*	1
Cabbage White	*Pieris rapae*	3
Clouded Sulphur	*Colias philodice*	35
Common Checkered-Skipper	*Burnsius communis*	2
Common Ringlet	*Coenonympha tullia*	1
Common Wood-Nymph	*Cercyonis pegala*	23
Coral Hairstreak	*Satyrium titus*	1
Fritillary sp.		1
Meadow Fritillary	*Boloria bellona*	3
Monarch	*Danaus plexippus*	2
Painted Lady	*Vanessa cardui*	3
Regal Fritillary	*Speyeria idalia*	4
Skipper sp.		2
Tawny-edged Skipper	*Polites themistocles*	7
Variegated Fritillary	*Euptoieta claudia*	1

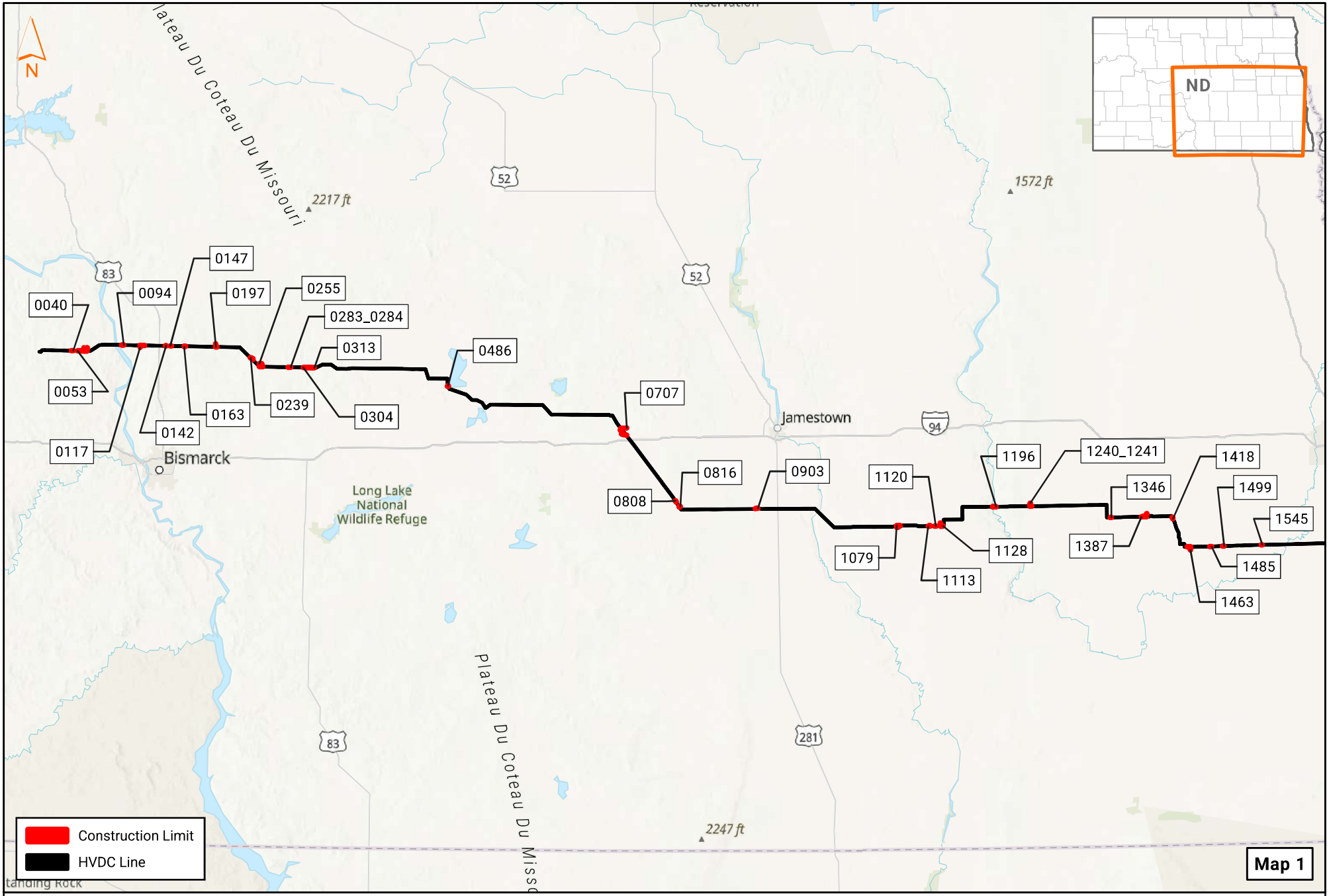
As part of our reporting requirement specific to MNR's federal recovery permit, results of this effort will be shared with the US Fish and Wildlife Service in our year-end report. We will include this report in that submittal.

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

Respectfully submitted,

Emma Greenlee

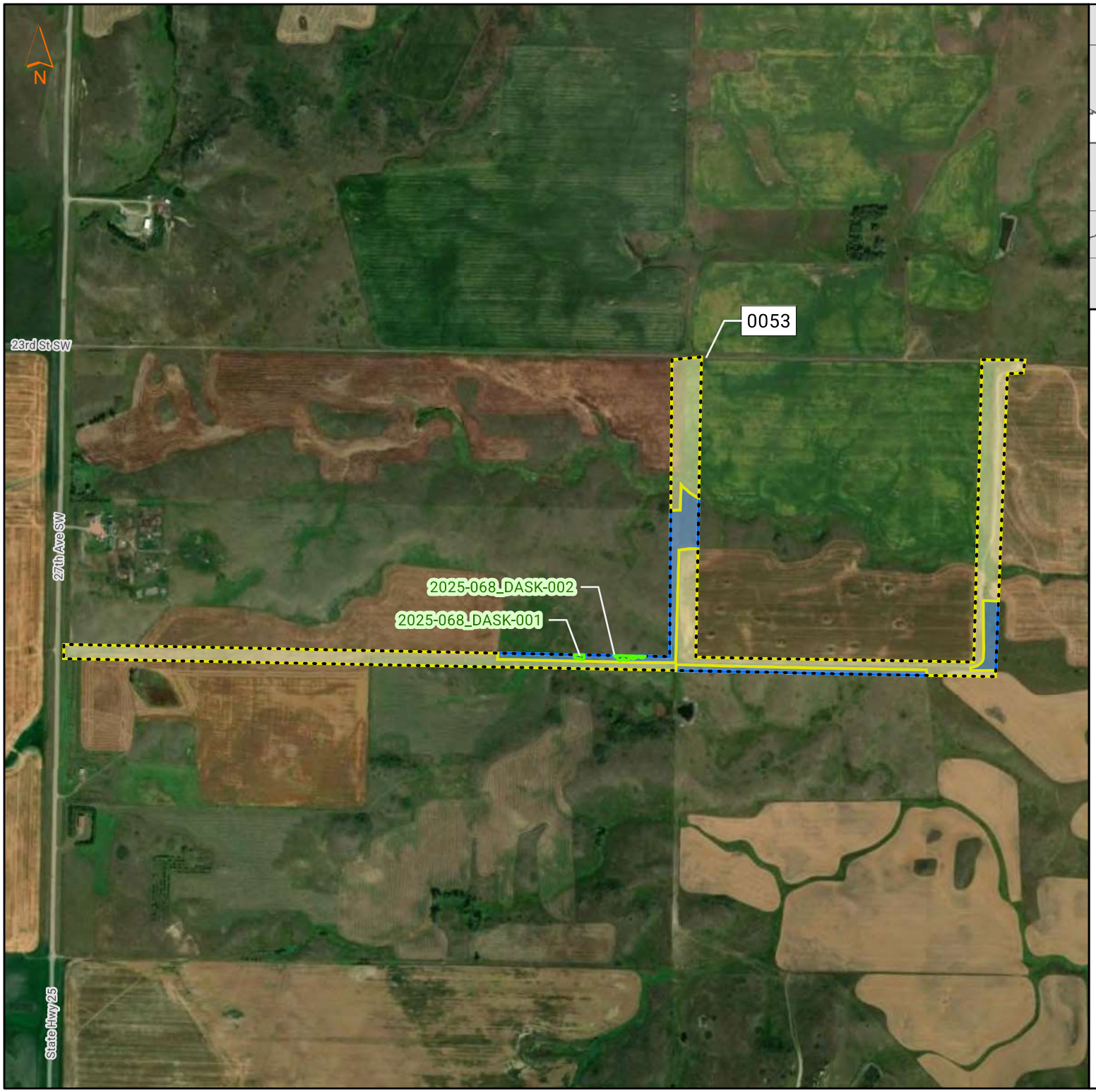
Emma Greenlee, MS
Ecologist
Midwest Natural Resources, Inc.

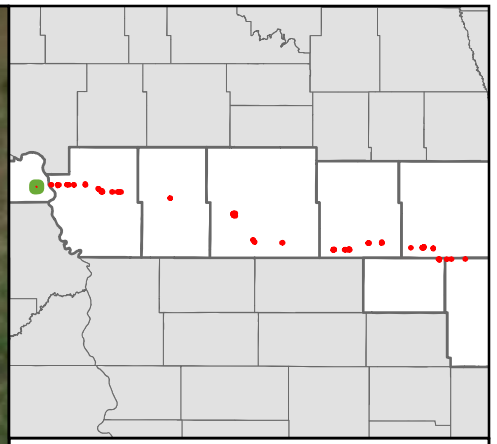


Sources: Esri World Topographic Map, US Census Bureau, Date: 7/28/2026

0 20 40 Miles

Project Overview
HVDC Line Structure Replacement
Minnesota Power
North Dakota





MNR

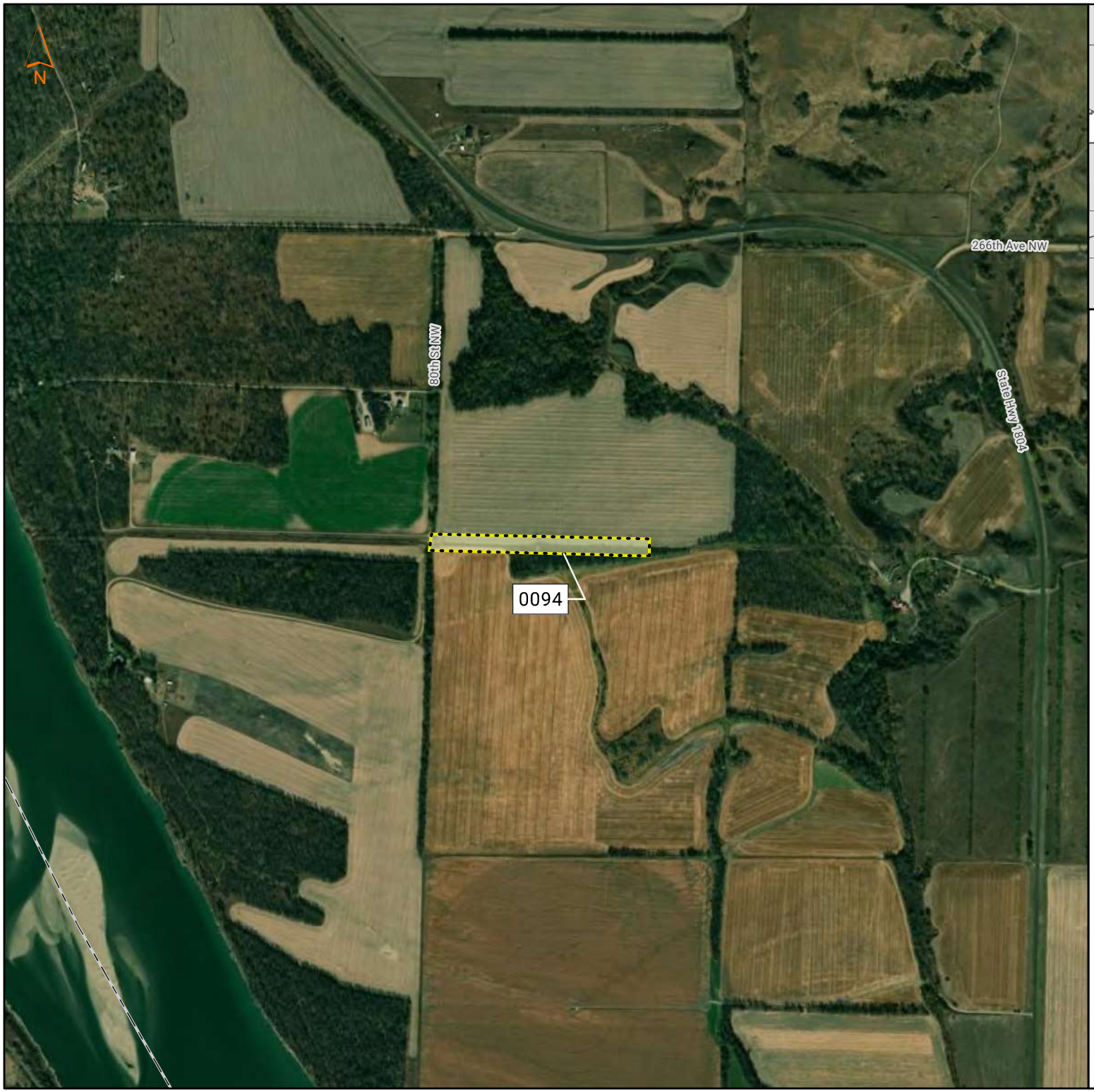
Survey Status
HVDC Line Structure Replacement
Minnesota Power
Oliver County, North Dakota

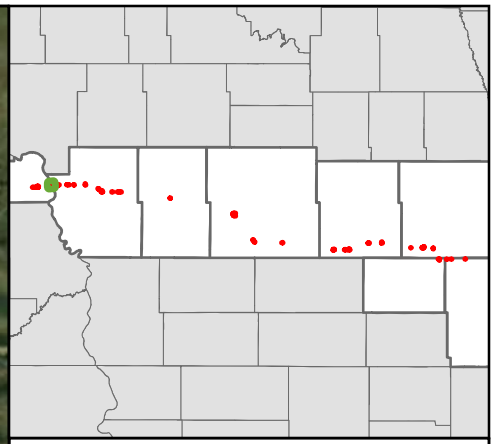
Map 3 of 32

- Field evaluated - Habitat delineation
- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

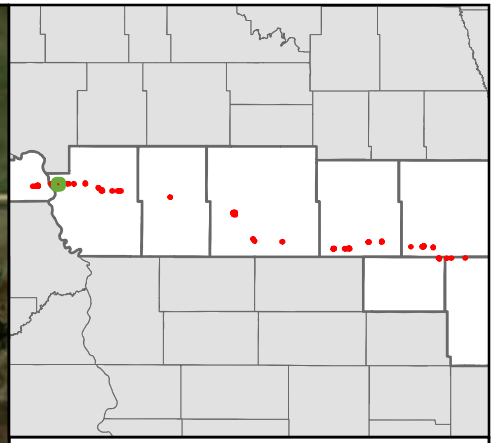
Map 4 of 32

Desktop review - No habitat
Construction Limit

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Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

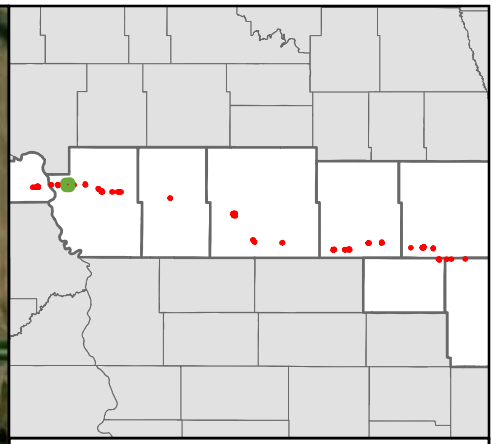
Map 5 of 32

Desktop review - No habitat
Construction Limit

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Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

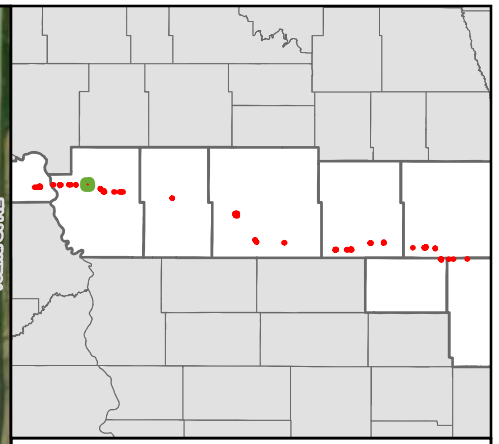
Map 6 of 32

Desktop review - No habitat
Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

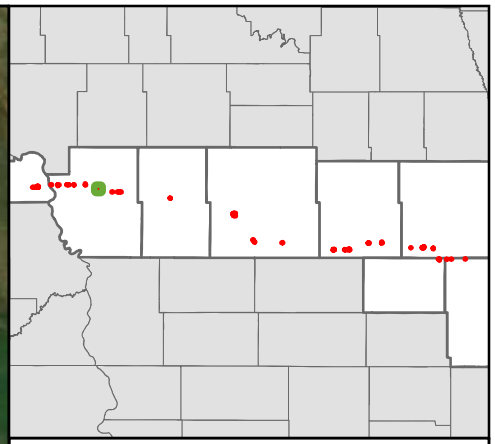
Map 8 of 32

- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

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Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

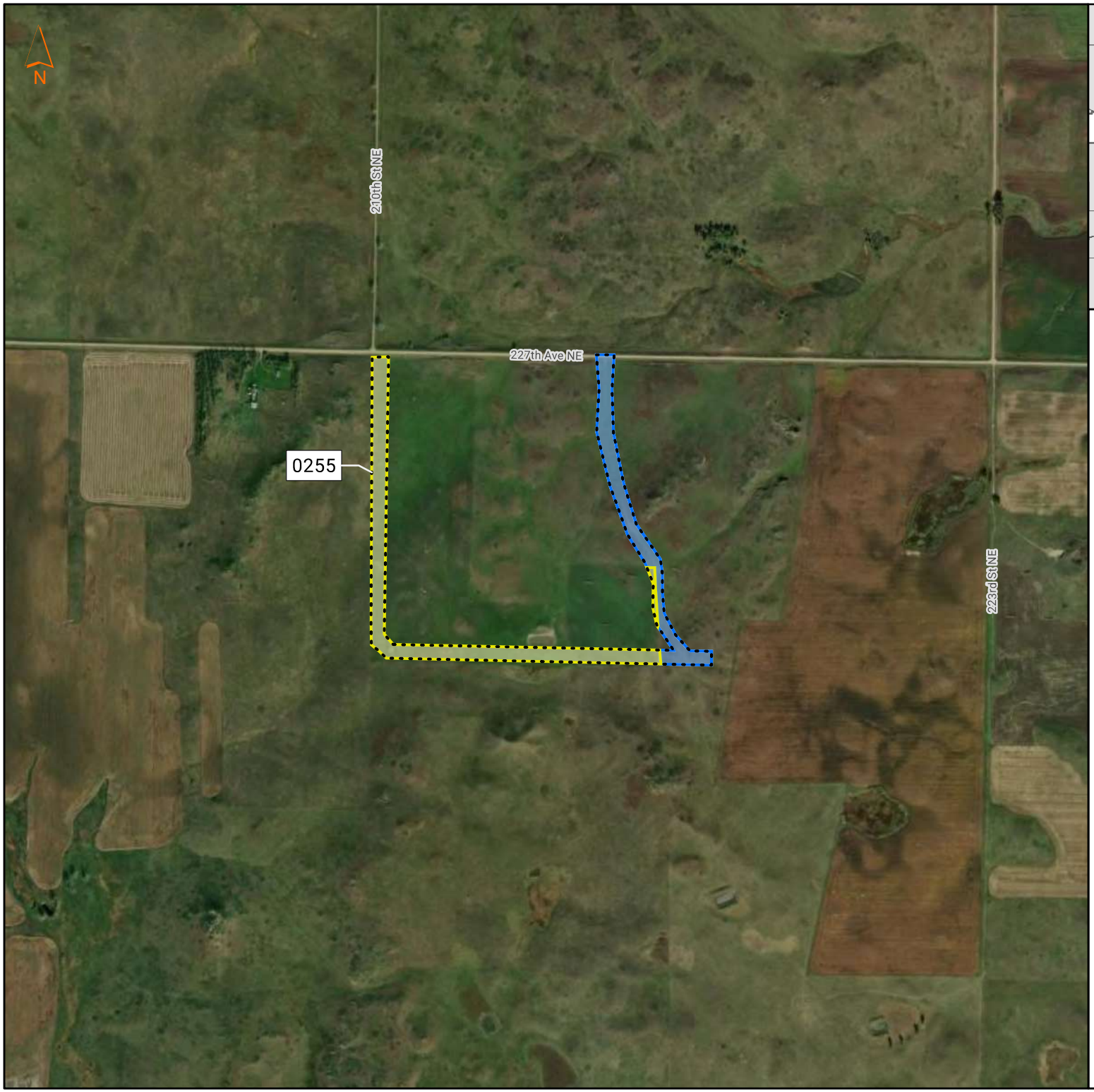
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HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

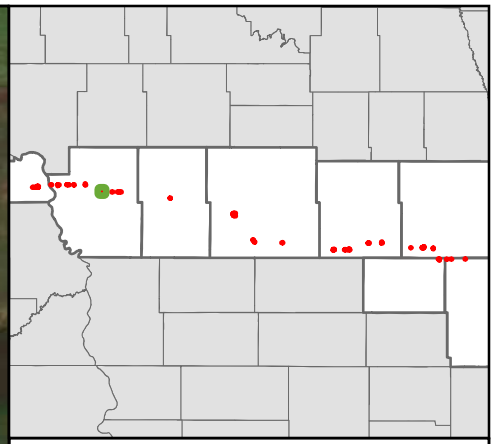
Map 9 of 32

- Field evaluated - Habitat delineation
- Field evaluated - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

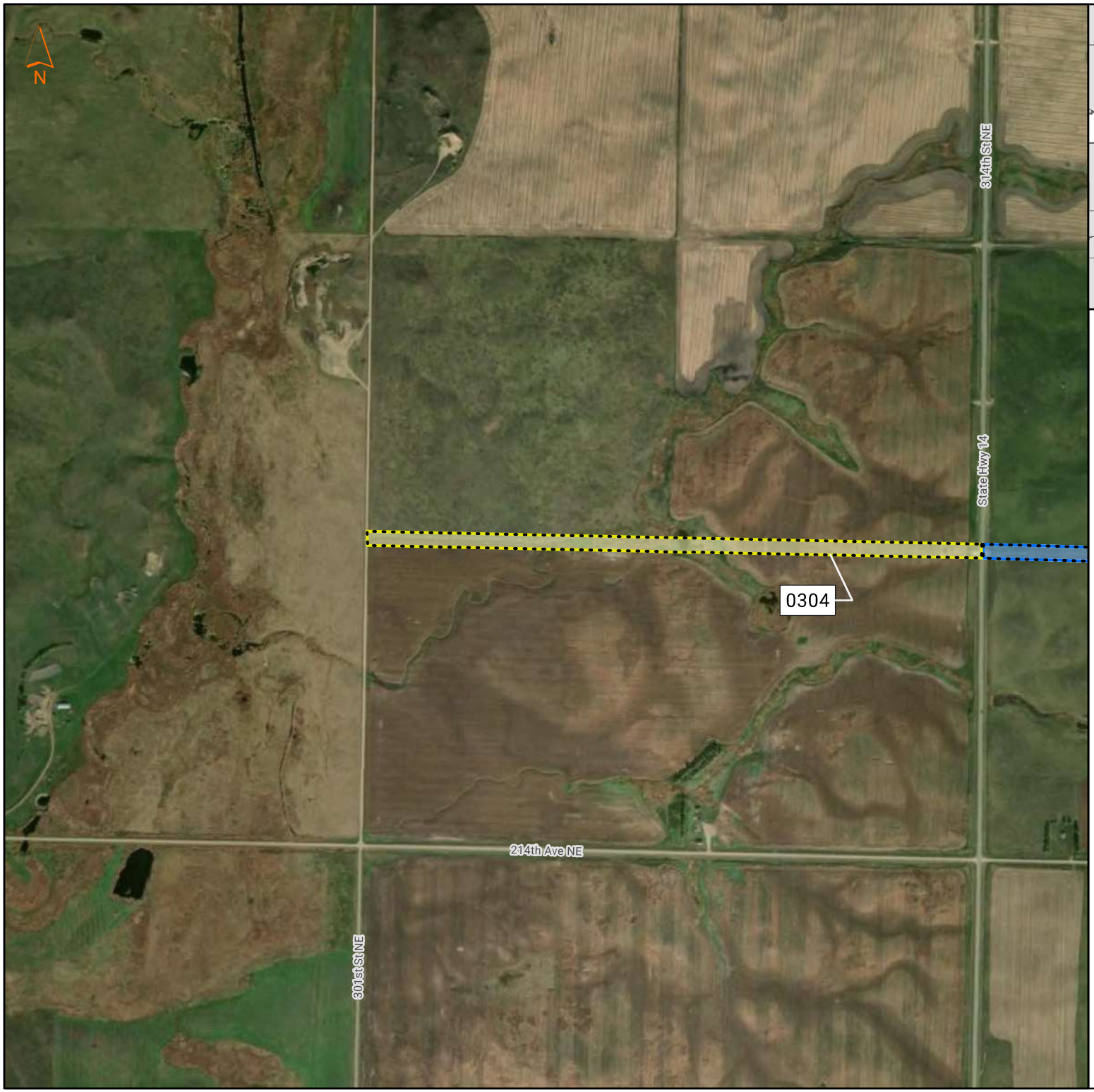
Survey Status
HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

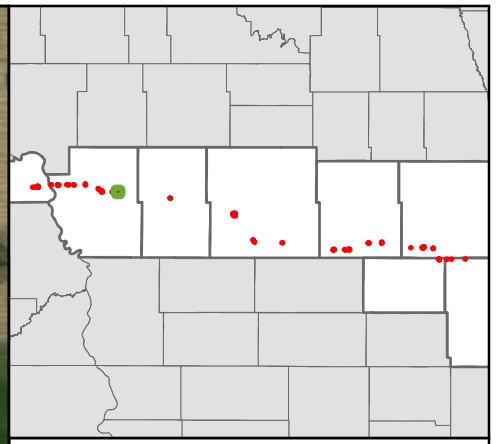
Map 10 of 32

- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

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Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





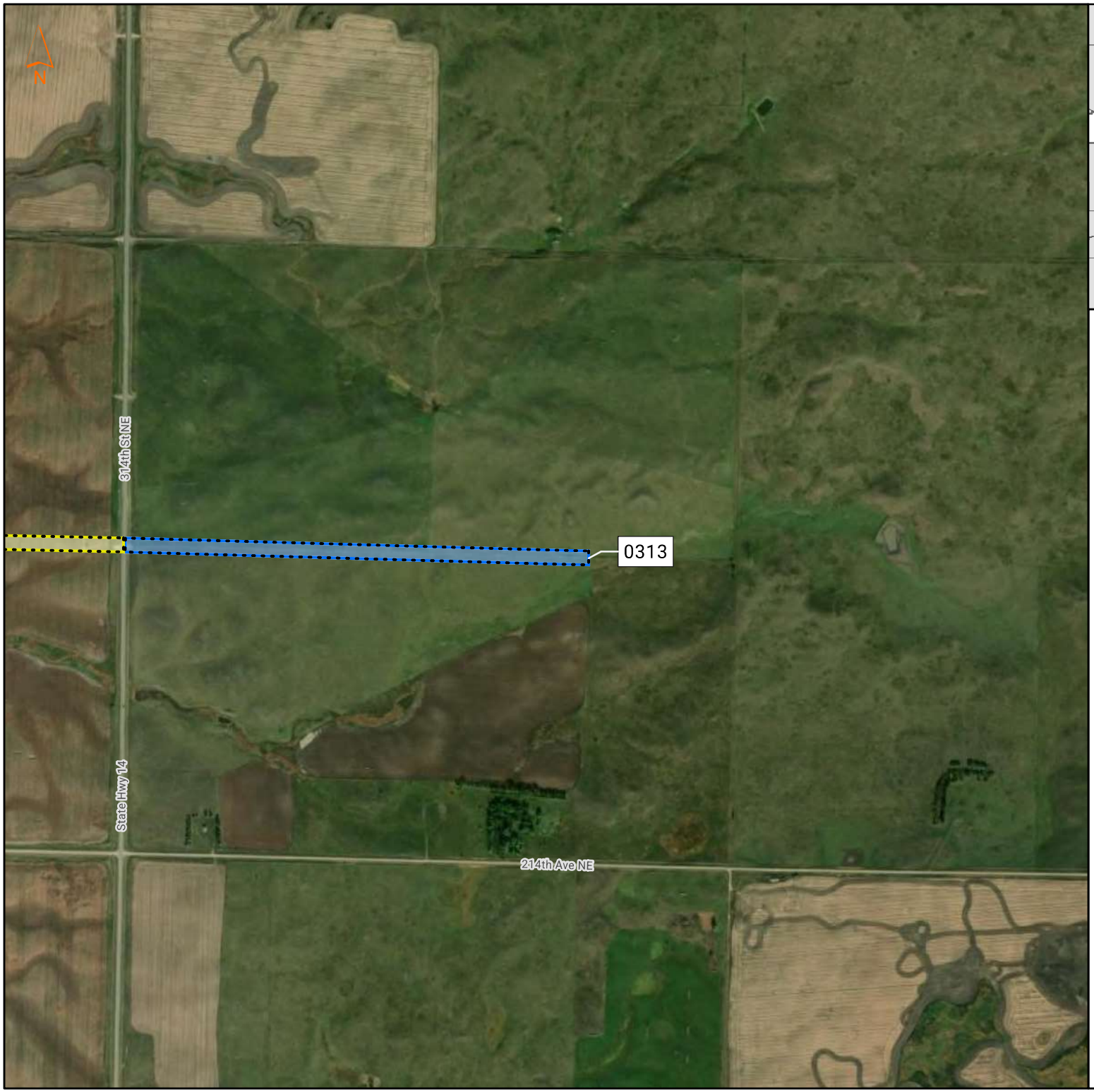
Survey Status
HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

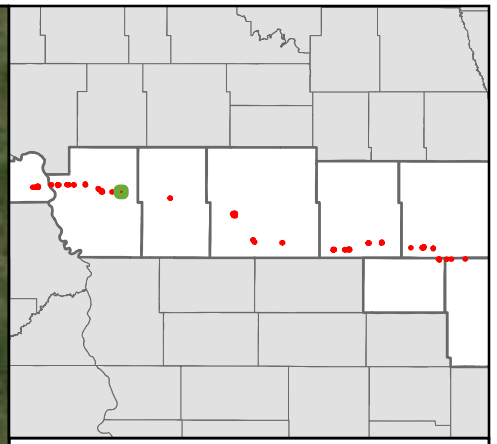
Map 12 of 32

- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

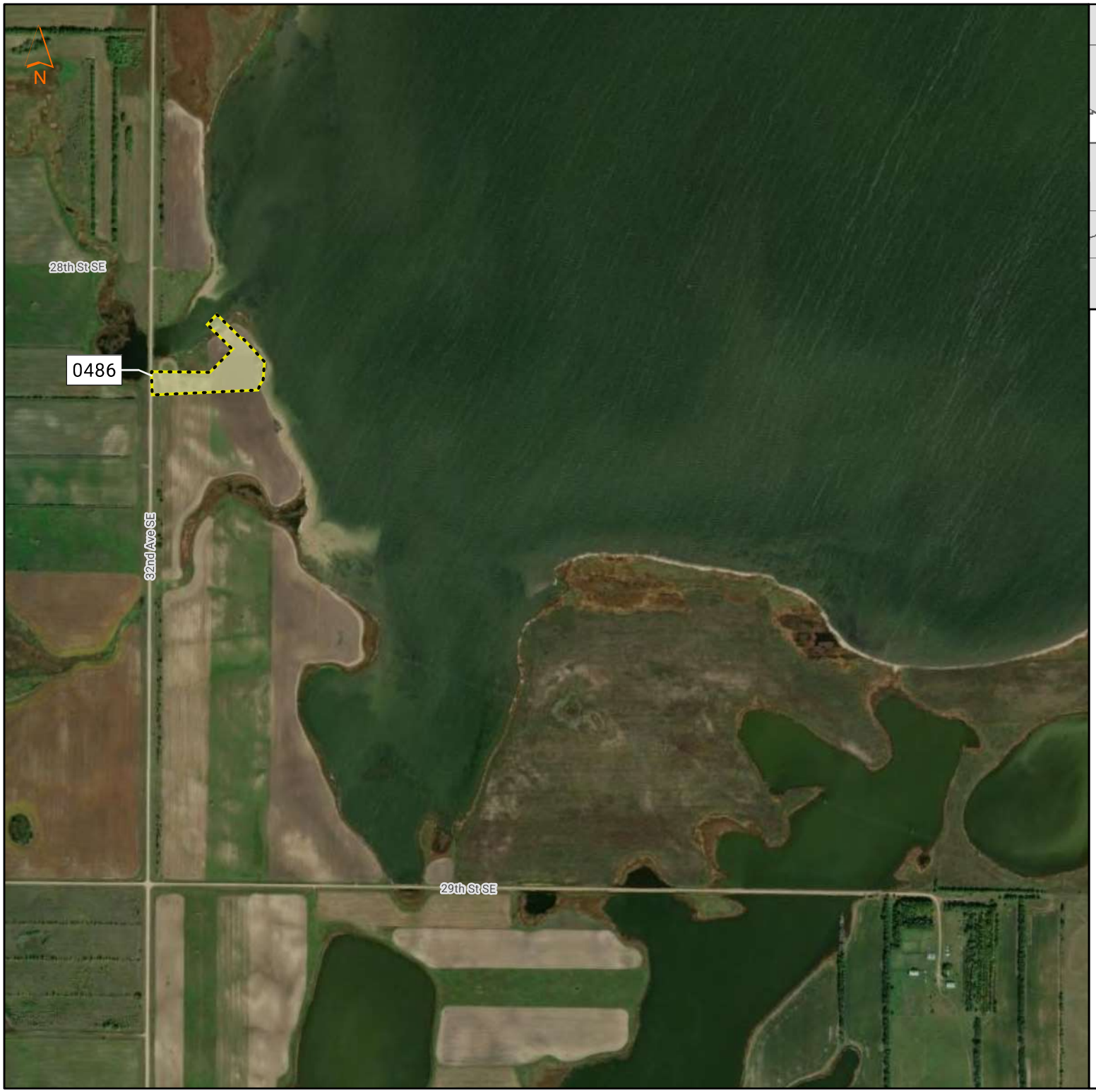
Survey Status
HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

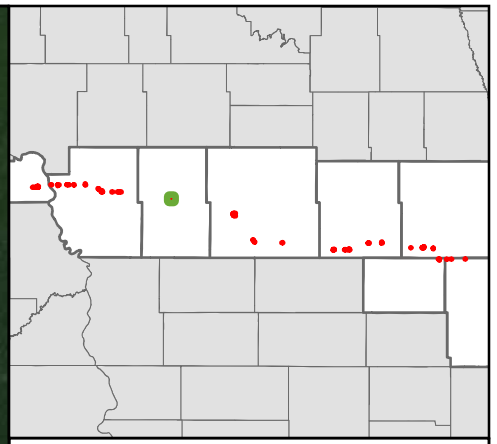
Map 13 of 32

- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

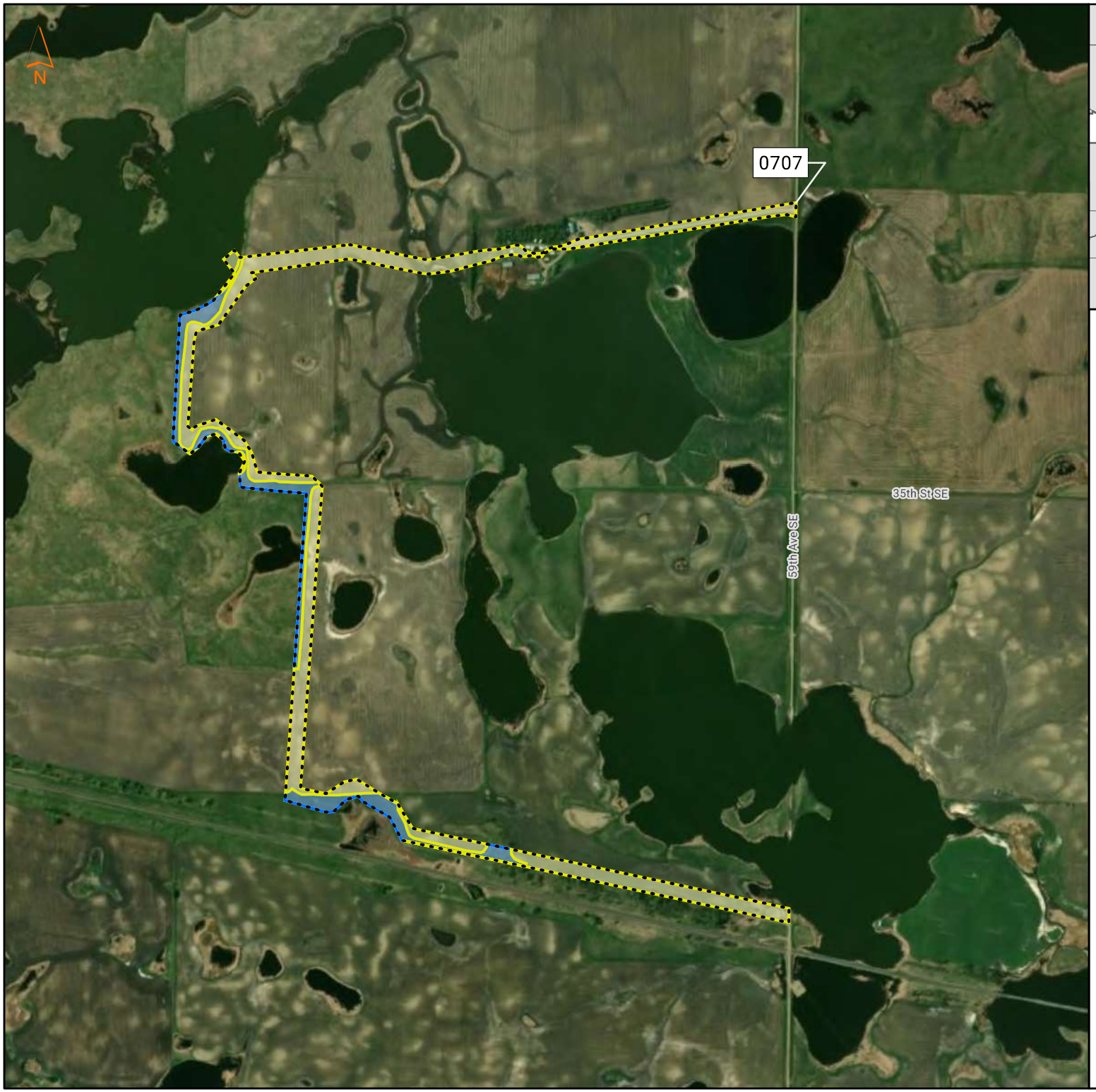
Survey Status
HVDC Line Structure Replacement
Minnesota Power
Kidder County, North Dakota

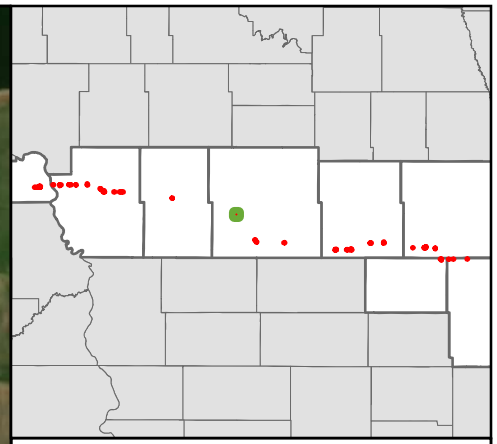
Map 14 of 32

Desktop review - No habitat
Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Stutsman County, North Dakota

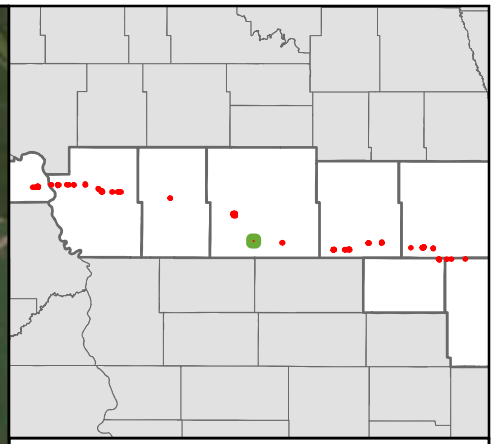
Map 15 of 32

- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

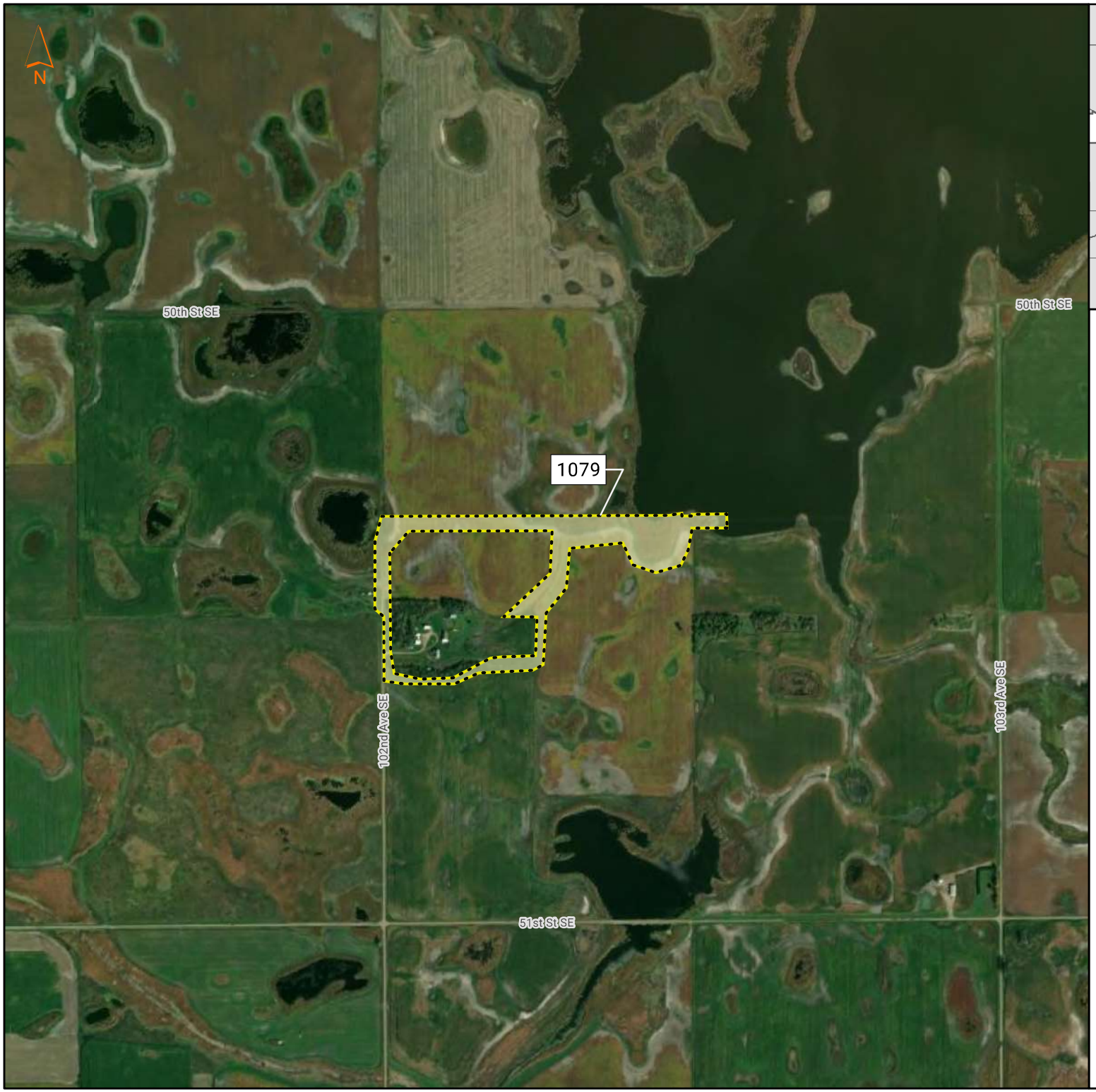
Survey Status
HVDC Line Structure Replacement
Minnesota Power
Stutsman County, North Dakota

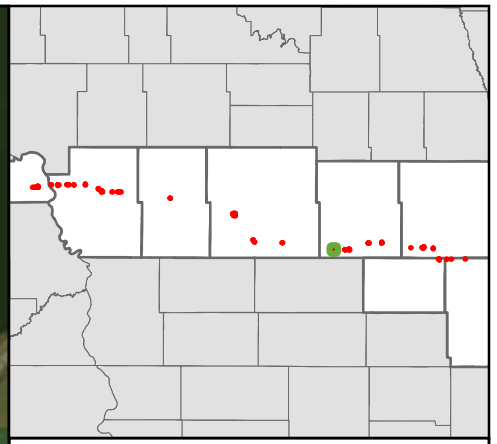
Map 16 of 32

- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Barnes County, North Dakota

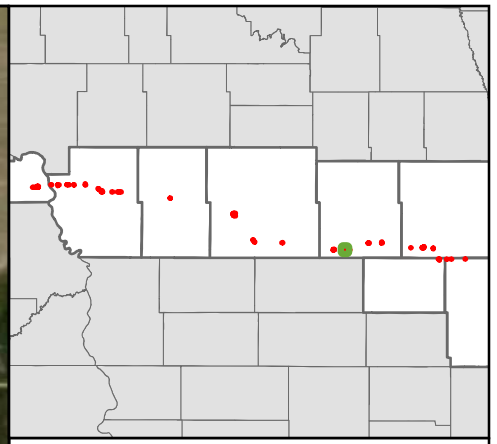
Map 18 of 32

Desktop review - No habitat
Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Barnes County, North Dakota

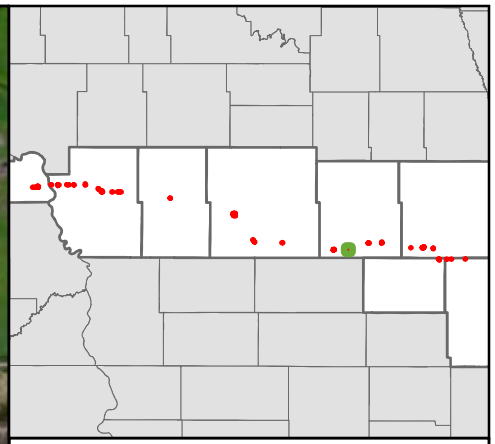
Map 19 of 32

- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Barnes County, North Dakota

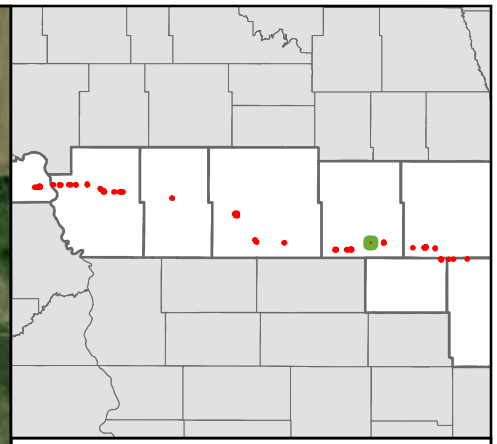
Map 20 of 32

- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Barnes County, North Dakota

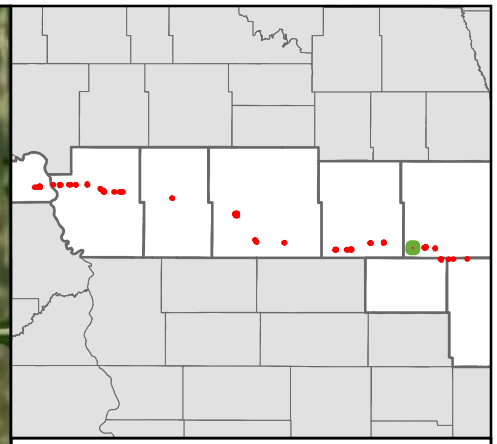
Map 21 of 32

Desktop review - No habitat
Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Cass County, North Dakota

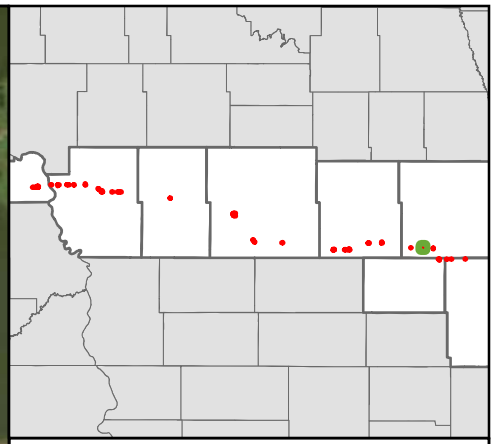
Map 23 of 32

Desktop review - No habitat
Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Cass County, North Dakota

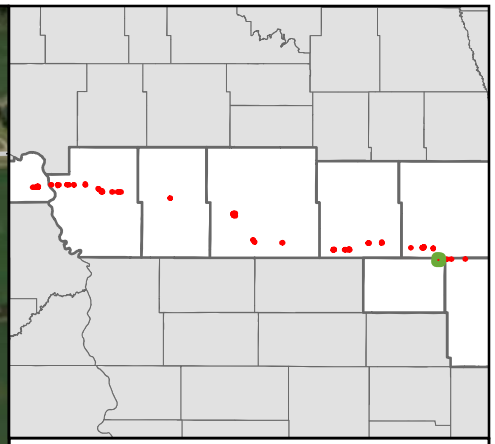
Map 24 of 32

Desktop review - No habitat
Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Ransom County, North Dakota

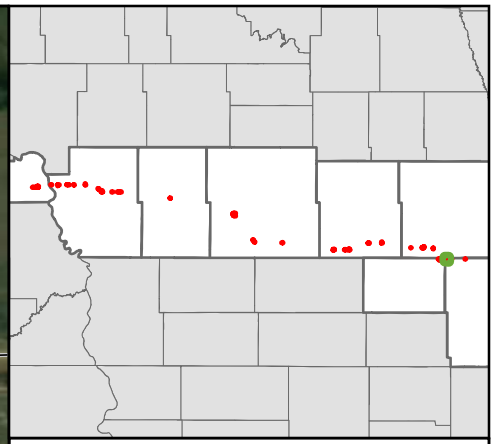
Map 26 of 32

Desktop review - No habitat
Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Richland County, North Dakota

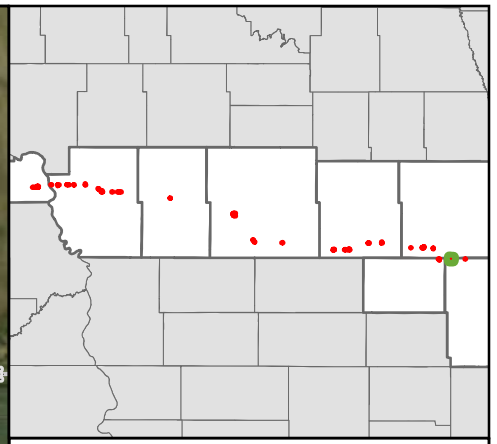
Map 27 of 32

- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Survey Status
HVDC Line Structure Replacement
Minnesota Power
Richland County, North Dakota

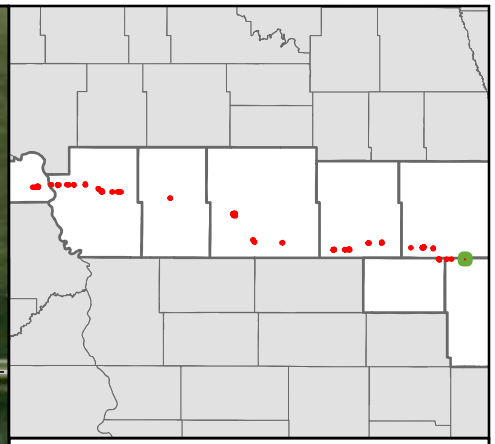
Map 28 of 32

- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

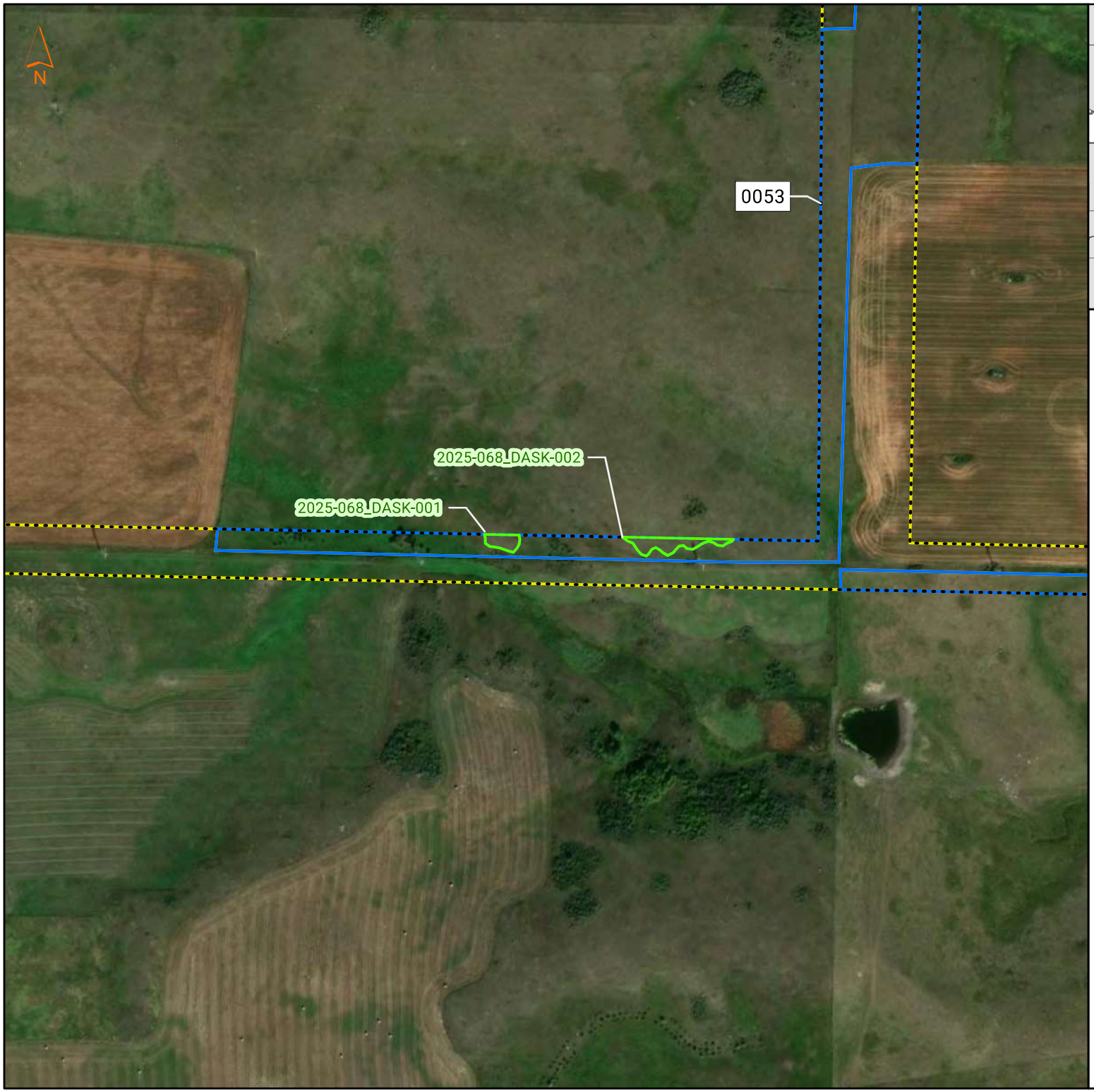
Survey Status
HVDC Line Structure Replacement
Minnesota Power
Richland County, North Dakota

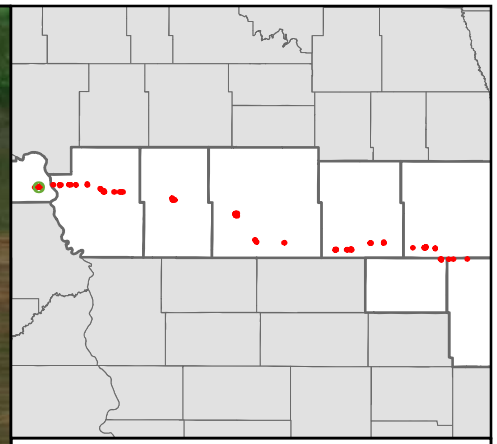
Map 29 of 32

- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

0 1,000 2,000
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





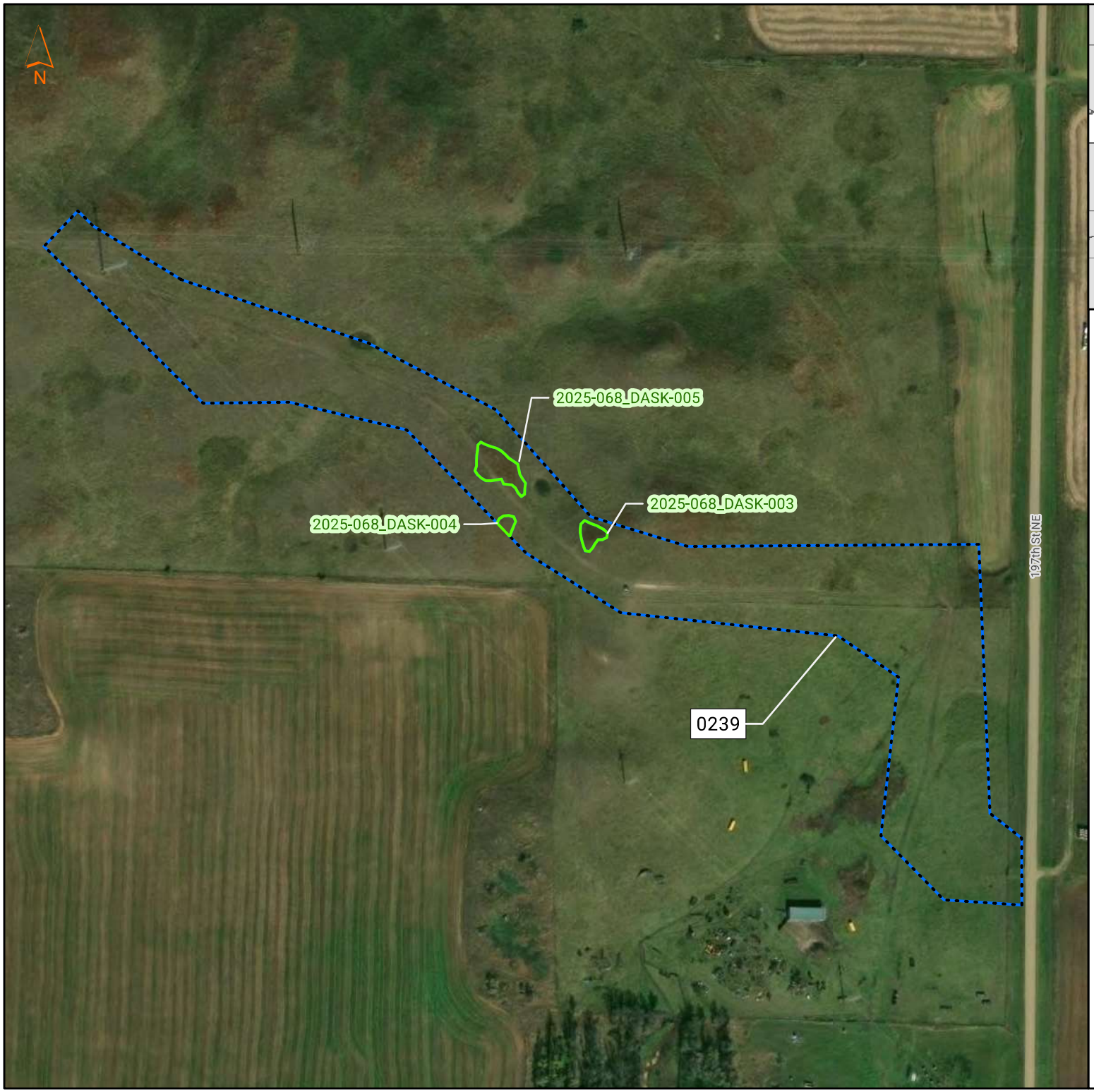
Habitat Delineation
HVDC Line Structure Replacement
Minnesota Power
Oliver County, North Dakota

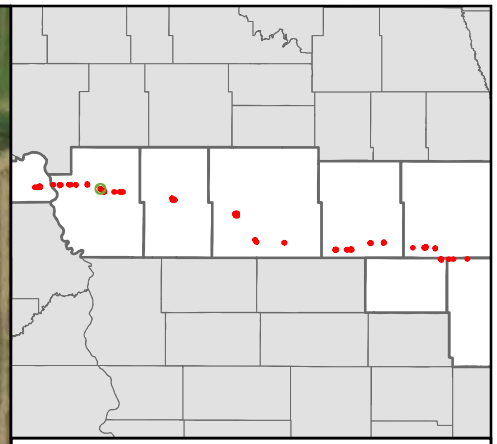
Map 30 of 32

- Field evaluated - Habitat delineation
- Field evaluated - No habitat
- Desktop review - No habitat
- Construction Limit

0 250 500
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

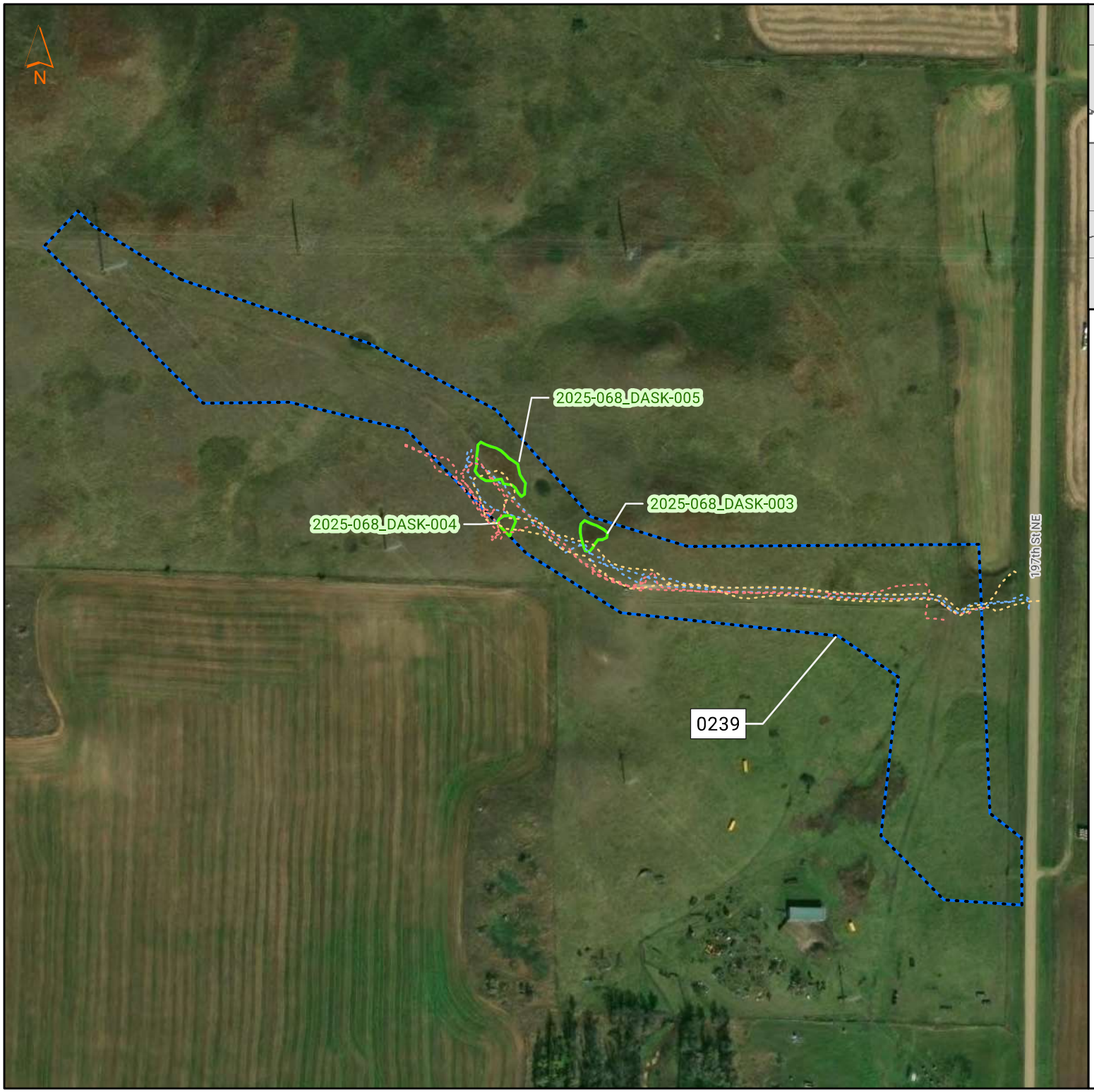
Habitat Delineation
HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

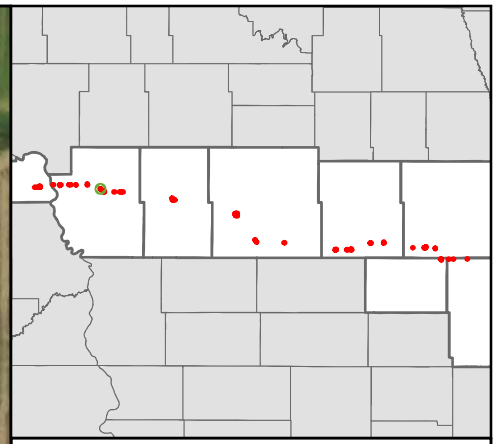
Map 31 of 32

- Field evaluated - Habitat delineation
- Field evaluated - No habitat
- Construction Limit

0 250 500
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026





MNR

Occupancy Survey
HVDC Line Structure Replacement
Minnesota Power
Burleigh County, North Dakota

Map 32 of 32

- Field evaluated - Habitat delineation
- Field evaluated - No habitat
- Construction Limit

Meander Track

- 7/3/2026
- 7/5/2026
- 7/8/2026

0 250 500
Feet

Sources: Esri World Imagery, US Census Bureau, Date: 7/28/2026