
Appendix E

USFWS, MnDOT and MnDNR Correspondence – Threatened and Endangered Species
Review

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Minnesota Department of Transportation

395 John Ireland Boulevard
Saint Paul, MN 55155

December 11, 2014

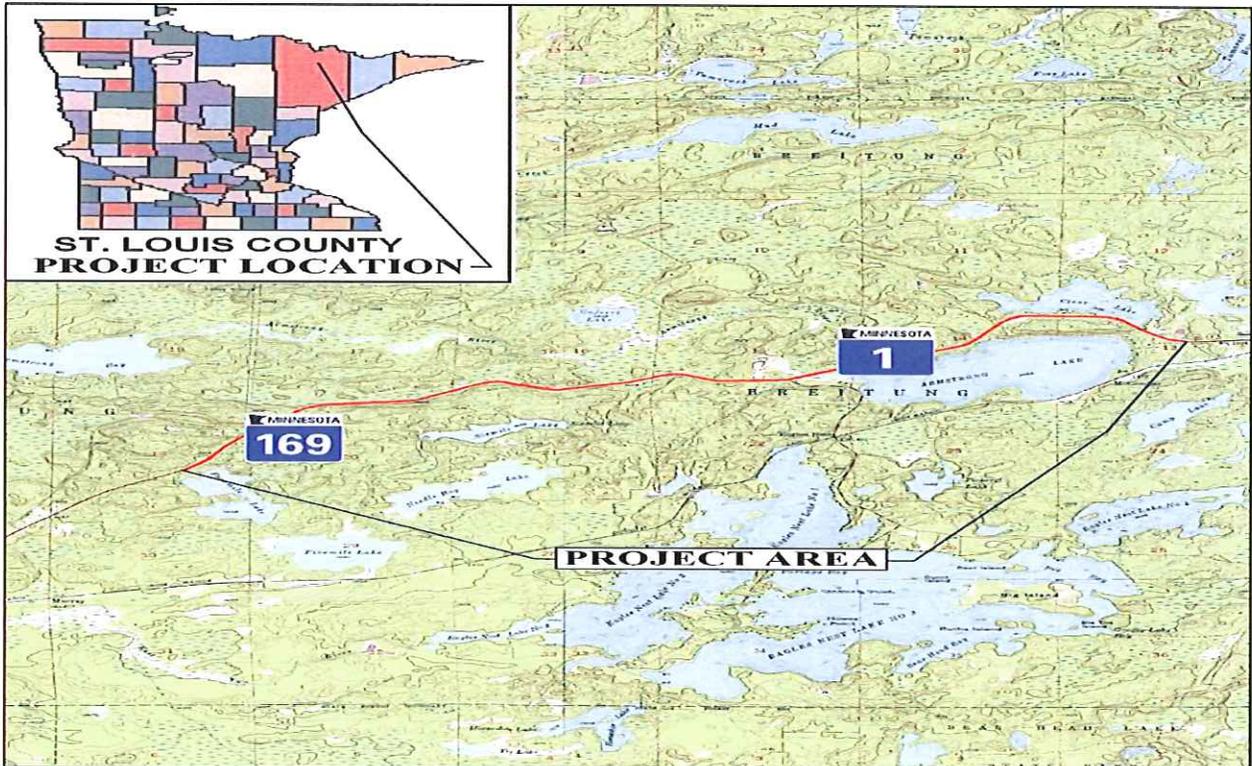
Andrew Horton
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Twin Cities ES Field Office
4101 American Blvd East
Bloomington, MN 55425-1665

State Project 6904-46, Trunk Highway 1/169, St. Louis County, Roadway Reconstruction/Realignment
Request for Concurrence – May Affect, Not Likely to Adversely Affect Determination – Canada Lynx (*Lynx canadensis*)
Process Agreement - No Jeopardy Determination – Northern long-eared bat (*Myotis septentrionalis*)
No Jeopardy Determination – Rufa red knot (*Calidris canutus rufa*)
No Effect Determination – Piping plover (*Charadrius melodus*)

Project Description

The Minnesota Department of Transportation (MnDOT) is proposing construction on Trunk Highway 1/169 in the Eagles Nest Lake Area in rural St. Louis County, in northeastern Minnesota. A portion of the project funding will be provided through the Federal Highway Administration (FHWA). The project area includes approximately 5.6 miles of Highway 1/169 from just west of the Six Mile Lake Road intersection on the west to approximately 0.1 miles east of Bradach Road on the east. The project includes widening the shoulders, expanding the clear zones, adding turn/bypass lanes, and realignment of portions of the highway. A more detailed project description, along with the project purpose and need, is described in the attached sections from the draft Environmental Assessment.

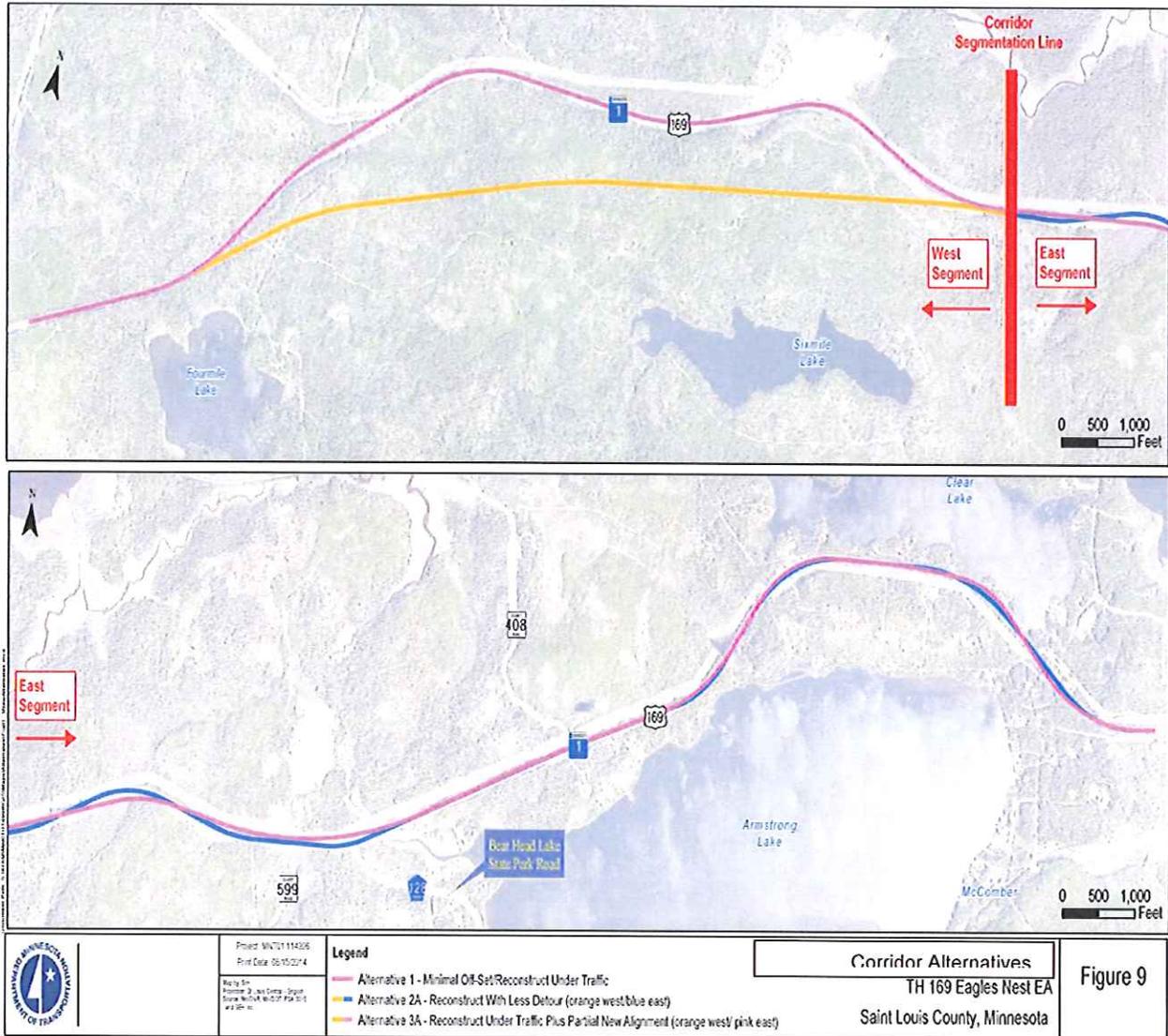
Project Location Map



State Project 6904-46, Trunk Highway 1/169, St. Louis County, Roadway Reconstruction/Realignment
Request for Concurrence – May Affect, Not Likely to Adversely Affect Determination – Canada Lynx (*Lynx canadensis*)
Process Agreement - No Jeopardy Determination – Northern long-eared bat (*Myotis septentrionalis*)

Project Alternatives

Several project alternatives were advanced and analyzed using a sequential evaluation and screening process in order to arrive at a preferred project alternative. After reviewing the resulting data, alternative 3A was identified as the preferred alternative. The complete alternative development and decision-making process is described in the attached sections from the draft Environmental Assessment.



Previous Consultation

MnDOT on behalf of the FHWA, the lead federal agency for this project, had previously informally consulted with the U.S. Fish and Wildlife Service (Service) on this action. On May 18, 2011, MnDOT sent a letter requesting concurrence for a may affect, not likely to adversely affect determination for both the Canada lynx and the gray wolf, including an analysis of potential impacts to designated critical habitat. On October 14, 2011, the Service concurred with these determinations, concluding the informal consultation process under Section 7 of the Endangered Species Act of 1973, as Amended (Act).

Since the time of this consultation, changes have occurred to both the proposed action as well as the species receiving/proposed to receive protection under the Act. The discussion below focuses upon the current conditions of the project and species listing and the corresponding determinations.

Species List for the Project County

According to the official County Distribution of Minnesota's Federally-Listed Threatened, Endangered, Proposed, and Candidate Species list (revised in October 2014), maintained by the Service, the project county is within the distribution range of the following:

County	Species	Status	Habitat
St. Louis	Canada lynx (<i>Lynx canadensis</i>)	Threatened	Northern forest
	Canada lynx (<i>Lynx canadensis</i>)	Critical Habitat	Map of lynx critical habitat in Minnesota
	Northern long-eared bat <i>Myotis septentrionalis</i>	Proposed as Endangered	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. Roosts and forages in upland forests during spring and summer.
	Piping Plover (<i>Charadrius melodus</i>) Great Lakes Breeding Population	Endangered and Critical Habitat Designated in this county	Sandy beaches, islands
	Rufa Red knot (<i>Calidris canutus rufa</i>)	Proposed Threatened	Coastal areas along Lake Superior

Species Proposed for Federal Listing in the Action Area

Section 7(a)(4) requires Federal agencies to confer with the Service on any agency action that is likely to jeopardize the continued existence of any species proposed for listing or result in the adverse modification of critical habitat proposed to be designated. A conference may involve informal discussions between the Service, the action agency, and the applicant. Following informal conference, the Service issued a conference report containing recommendations for reducing adverse effects. These recommendations are discretionary, because an agency is not prohibited from jeopardizing the continued existence of a proposed species or from adversely modifying proposed critical habitat. However, as soon as a listing action is finalized, the prohibition against jeopardy or adverse modification applies, regardless of the stage of the action.

While consultation under Section 7 of the Act is required when a proposed action "may affect" a listed species, a conference is required only if the proposed action is likely to jeopardize the continued existence of a proposed species or destroy or adversely modify proposed critical habitat. The Conference process is discretionary for all other effect determinations besides jeopardy/adverse modification. However, it is in the best interest of the species and our federal partners to consider the value of voluntary conservation measures in a conference opinion or conference report for projects that are not likely to cause jeopardy, but are likely to adversely affect the NLEB.

Rufa red knot – Determination of No Jeopardy

There are no known occurrences of this species within the action area. In addition, the project area does not contain habitat preferred by the species. Currently there is no critical habitat proposed for this species. Therefore, MnDOT, on behalf of the FWHA, has made a determination of no jeopardy for this species.

Northern long-eared bat - Determination of No Jeopardy

The action area is located within approximately 3 miles of one of the largest known hibernacula for the northern long-eared bat in the State of Minnesota, near the town of Sudan. Due to the close proximity, the proposed project is well within the known distribution distances for the bat's summer roosting/foraging activities.

As indicated in the Northern Long-Eared Bat Interim Conference and Planning Guidance issued by the Service on January 6, 2014, the northern long-eared bats uses a variety of tree species during its summer roosting and foraging activities. As a result, any action that requires the removal of trees during this summer period, which is approximately, April 1- October 1, could potentially result in some form of take, either direct or indirect or potentially both. As highlighted in the table below, all of the alternatives analyzed would require a considerable amount of tree removal. Unfortunately, due various project constraints, winter tree removal is not an option at this time. As a result, MnDOT has been working closely with the Service to ensure that the appropriate determination is made given the species current status and also that the appropriate process is followed should the species become officially listed prior to the completion of project construction.

Cover Type	Alternative					
	Alternative 1 Minimal Off-Set/Construct Under Traffic		Alternative 2A Reconstruct on Existing With Detour		Alternative 3A (Preferred Alternative) Reconstruct Under Traffic Plus Partial New Alignment	
	Before	After	Before	After	Before	After
Wetlands	13 ^a ac.	0 ac.	7 ^a ac.	0 ac.	11 ^a ac.	0 ac.
Deep water/streams	0 ac.	0 ac.	0 ac.	0 ac.	0 ac.	0 ac.
Wooded/forest	48 ac.	0 ac.	73 ac.	0 ac.	75 ac.	0 ac.
Brush/Grassland/Road Ditch	53 ac.	107 ac.	82 ac.	148 ac.	83 ac.	155 ac.
Cropland	0 ac.	0 ac.	0 ac.	0 ac.	0 ac.	0 ac.
Lawn/landscaping	0 ac.	0 ac.	0 ac.	0 ac.	0 ac.	0 ac.
Impervious Surface	22 ac.	29 ac.	25 ^b ac.	39 ^c ac.	25 ^b ac.	39 ^c ac.
Other	0 ac.	0 ac.	0 ac.	0 ac.	0 ac.	0 ac.
TOTALS	136 ac.	136 ac.	187 ac.	187 ac.	194 ac.	194 ac.

In reviewing the project impacts with the Service, it was determined that all of the build alternatives considered for the project have some potential for impacting forest vegetation that could be utilized by the northern long-eared bat (see table above). However based on the current species information and due to the linear nature of the vegetation removal, MnDOT, on behalf of FHWA, has determined that these impacts are not of a magnitude that would result in jeopardizing the continued existence of this species. Currently there is no critical habitat proposed for this species.

Therefore, in accordance with Section 7(a)(4) of the Act, described above, MnDOT will continue working with the Service through a voluntary informal conferencing process for the Northern long-eared bat. This process would provide a mechanism to both bridge the gap should the species listing status change from proposed to either threatened or endangered prior to project completion as well as a way of expediting the formal consultation process should the Service make the determination that formal consultation is the appropriate path at the time of the status change.

Federally-Listed Species/Designated Critical Habitat in the Action Area

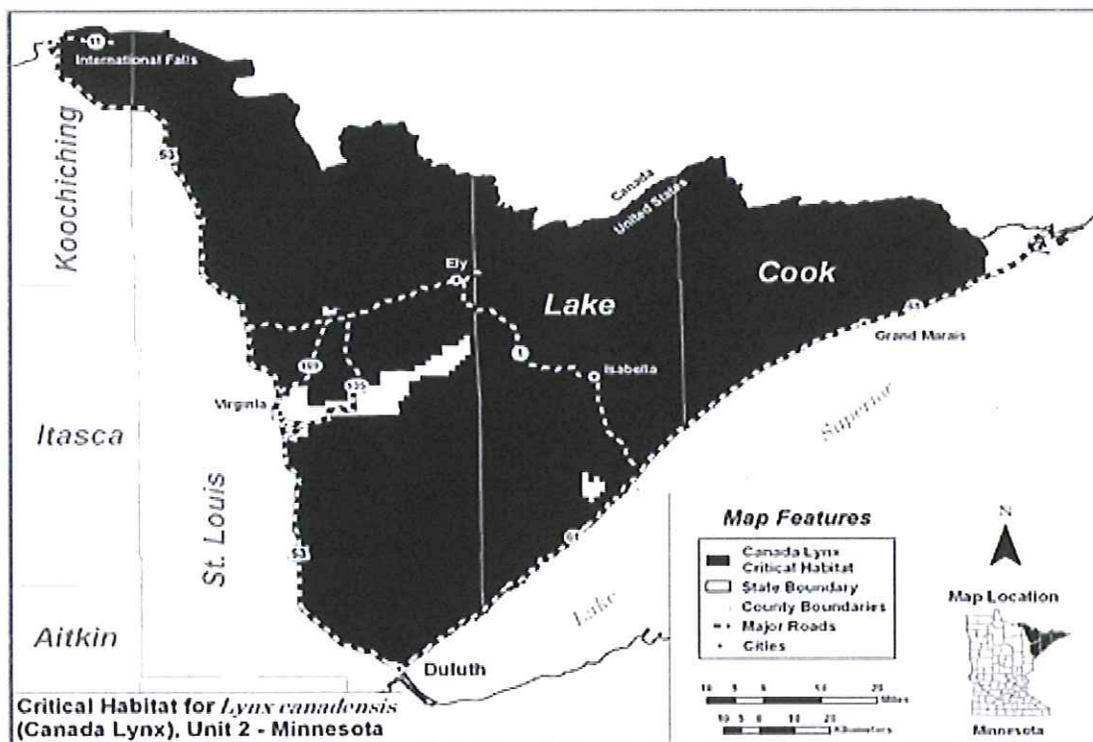
Section 7 of Endangered Species Act of 1973, as amended (Act), requires each Federal agency to review any action that it funds, authorizes or carries out to determine whether it may affect threatened, endangered, proposed species or listed critical habitat. Federal agencies (or their designated representatives) must consult with the U.S. Fish and Wildlife Service (Service) if any such effects may occur as a result of their actions. Consultation with the Service is not necessary if the proposed action will not directly or indirectly affect listed species or critical habitat. If a federal agency finds that an action will have no effect on listed species or critical habitat, it should maintain a written record of that finding that includes the supporting rationale.

Piping Plover – Determination of No Effect

There are no known occurrences of this species within the action area. In addition, the project area does not contain habitat preferred by the species and is well outside of any designated critical habitat. Therefore, MnDOT on behalf of the FHWA has made a determination of no effect for this species.

Canada lynx and Associated Critical Habitat action – May Affect, not likely to Adversely Affect Determination

The proposed action is located within both the species distribution range as well as an area designated as critical habitat.



In comparing the existing roadway with the preferred alternative, the new roadway dimensions will be relatively similar with the exception of the turn lane sections which would require added roadway width. The proposed action would not result in a higher posted speed limit or result in added vehicular capacity.

Modification of Critical Habitat

Critical habitat for the lynx is defined as boreal forest landscapes supporting a mosaic of differing successional forest stages and containing the following Primary Constituent Elements:

The proposed TH 1/169 reconstruction project will require alignment shifts and corridor widening, resulting in additional land disturbances. The following factors related to Canada lynx critical habitat were considered in making a determination of the potential for adverse effects to the lynx:

1. Presence of snowshoe hares (*Lepus americanus*) and their preferred habitat conditions, which include dense understories of young trees, shrubs or overhanging boughs that protrude above the snow, and mature multistoried stands with conifer bough touching the snow surface.

Habitat for snowshoe hares is present throughout the project area. The project will result in relocation of the roadway in several areas and as indicated in the table above, will result in the removal of several acres of vegetation. In reviewing vegetation impacts in relation to the known species requirements with the Service, it has been determined that the removal of these relatively small linear takings of the boreal forest stands in comparison to the surrounding landscape, would not negatively affect the lynx given the extensive range used by this species. For the same reason, the proposed action would not result in the permanent loss or conversion of the boreal forest on a scale proportionate to the large landscape used by lynx.

2. Winter snow conditions that are generally deep and fluffy for extended period of time.

The construction of this project will not result in changes in snow depth or compaction.

3. Sites for denning that have abundant coarse woody debris, such as downed trees and root wads

Sites for denning that have abundant coarse woody debris, such as downed trees and root wads. This project will involve the relocation of the roadway in several areas, which could result in localized area of disturbance. Therefore, the net long-term disturbance to denning habitat will be minimal.

4. Matrix habitat (e.g., hardwood forest, dry forest, non-forest or other habitat types that do not support snowshoe hares) that occurs between patches of boreal forest in close juxtaposition (at the scale of the lynx home range) such that the lynx are likely to travel through such habitat while accessing patches of boreal forest within a home range.

The project lies within contiguous boreal forest. The action will not interfere with travel by Canada lynx or result in the creation of corridor gaps impeding the ability of Canada lynx to travel from one location to another.

The preferred alternative will use approximately 3 miles of the existing 5.5 miles of roadway while approximately 2.5 miles will be constructed on new alignment. The remaining 2.5 miles of the existing roadbed will be utilized as follows:

- *1 mile will remain in place to provide residential access. Because of this change in use, it is currently planned to reduce the width of the roadway corridor and re-vegetate the previously disturbed areas.*
- *1.5 miles will be incorporated into the Mesabi Trail system. Again, because of this change in use, the corridor width will be reduced and previously disturbed areas re-vegetated. The existing bituminous surface will be removed and be replaced with a 10 ft. paved trail.*

MnDOT on behalf of the FHWA has determined that the proposed action may affect, but is not likely to adversely affect Canada lynx or result in adverse modification of designated critical habitat.

Concurrence Request/Process Agreement

MnDOT is requesting concurrence from the Service for the May Affect, Not Likely to Adversely Affect Determination for the Canada Lynx (*Lynx canadensis*). In addition, MnDOT would like the Service to provide written support of the process outlined above to undertake a voluntary informal conferencing for the northern long-eared bat.

Please do not hesitate to contact me if there are any questions or concerns,



Jason Alcott
Minnesota Department of Transportation
Office of Environmental Stewardship
395 John Ireland Boulevard
St. Paul, MN 55155
Phone: 651-366-3605
Email: Jason.alcott@state.mn.us

From: Nick_Rowse@fws.gov [mailto:Nick_Rowse@fws.gov]
Sent: Thursday, October 04, 2012 3:35 PM
To: Alcott, Jason (DOT)
Cc: Lillegaard, Cindy (DOT); Kalnbach, Michael K (DOT)
Subject: Re: Scope Change S.P. 6904-46, Trunk Highway 1, St. Louis County, Section 7 Consultation

Hi Jason,

This responds to your request for concurrence that our October 14, 2011 concurrence remains valid for a reduction in the scope of the proposed Trunk Highway 1 "Eagles Nest Lake" (State Project 6904-46) in St. Louis County. The revised project will consist of reconstructing the existing alignment with the correction of some geometric deficiencies. I concur that the proposed reduction in the scope of the project will also have a reduced impact and that the original determination of affect remains valid. Thank you for your cooperation in meeting our joint responsibilities under section 7 of the Endangered Species Act. If you have any further endangered species questions, please contact me at (612) 725-3548 x2210.

Sincerely,

Nick Rowse

Fish and Wildlife Biologist
Twin Cities ES Field Office
U.S. Fish and Wildlife Service
4101 American Blvd. E.
Bloomington, MN 55425-1665
612-725-3548 x2210
nick_rowse@fws.gov

"Alcott, Jason (DOT)"

<jason.alcott@state.mn.us>

10/04/2012 02:14 PM

To "Nick Rowse (nick_rowse@fws.gov)" <nick_rowse@fws.gov>

cc "Kalnbach, Michael K (DOT)" <Michael.Kalnbach@state.mn.us>,

"Lillegaard, Cindy (DOT)" <cindy.lillegaard@state.mn.us>

Subject Scope Change S.P. 6904-46, Trunk Highway 1, St. Louis County, Section 7 Consultation

Nick,

State Project 6904-46 (Eagles Nest Lake Area), Trunk Highway 1, St. Louis County was originally proposed as realignment of an extended distance of Trunk Highway 1 to correct for a localized icing problem. This project has been reduced in scope and now will primarily consist of reconstructing the existing alignment with the correction of some geometric deficiencies. This project and a similar action (S.P. 6936-17) were determined to not likely to adversely affect listed species. Both the original request and concurrence letters have been attached. We are seeking concurrence from the Service that the original determine of affect remains valid and that the provisions of the Section 7 consultation process have been met. Please let me know if you have questions or need additional information,

Jason[attachment "S.P. 6904-46, 6936-17 FWS Concurrence.pdf" deleted by Nick Rowse/R3/FWS/DOI] [attachment "S.P. 6904-46-6936-17, RFC.pdf" deleted by Nick Rowse/R3/FWS/DOI]



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Twin Cities Field Office

4101 American Blvd E.

Bloomington, Minnesota 55425-1665

October 14, 2011

Mr. Jason Alcott
Natural Resource Specialist
Office of Environmental Services
Minnesota Department of Transportation
395 John Ireland Boulevard
St. Paul, Minnesota 55155-1899

Dear Mr. Alcott:

This responds to your May 18, 2011, letter, requesting concurrence under section 7 of the Endangered Species Act of 1973, as amended, from our agency regarding the potential impacts of two highway reconstruction projects (S.P. 6904-46 "Eagles Nest Lake" - Trunk Highway (TH) 1/169 and S.P. 6936-17 "13 Hills" - TH 169) in St. Louis County, Minnesota. The purpose and need of these two projects are to address ongoing safety problems associated with the current highway geometrics and alignments. These two reconstruction projects are separate actions with independent utility; however, the two projects are being combined due to the similarities in both project type and location. The Minnesota Department of Transportation (Mn/DOT), acting as the non-federal representative for the Federal Highway Administration, has requested concurrence that the proposed actions from these two projects will not likely adversely affect Canada lynx (*Lynx canadensis*) or gray wolf (*Canis lupus*) or result in adverse modification of listed critical habitat for Canada lynx or gray wolf.

The proposed reconstruction of the "Eagles Nest Lake Area" section of TH 1/169, located east of Tower, extends from Six Mile Lake Road to Clear Lake Road for a distance of 5.4 miles. Improvements to the "Eagles Nest Lake" section of TH 1/169 include the reconstruction of the roadway, alignment shifts to flatten hills and straighten curves, installation of turn lanes and 8-foot paved shoulders, and improved ditching and roadway drainage. This part of the project is within an area designated as critical habitat for Canada lynx and gray wolf.

The proposed reconstruction of the "13 Hills" section of TH 169, located southwest of Tower, extends from County Road 438 to the south end of Bridge #69087 at Pike River for a distance of one mile. Improvements to the "13 Hills" section of TH 169 include reconstruction of the

roadway, an alignment shift to straighten curves, and improved ditching and roadway drainage. This part of the project is within critical habitat for Canada lynx.

Mn/DOT stated that the reconstruction projects will require alignment shifts and corridor widening resulting in additional land disturbances, but will not result in any adverse effects to Canada lynx critical habitat for the following reasons:

1. Presence of snowshoe hares and their preferred habitat conditions - Both projects will result in the relocation of TH 1/169 in several areas. The existing roadbed will be removed, except for those sections needed for access. Vegetation will be re-established on the removed roadbed. Therefore, the net long-term disturbance to snowshoe hare habitat will be minimal.
2. Winter snow conditions that are deep and fluffy for extended periods - Implementation of these proposed projects will not result in changes in snow depth or compaction.
3. Sites for denning that have abundant coarse woody debris, such as downed trees and root wads - Both projects will involve the relocation of the roadway in several areas, which could result in localized area of disturbance. Vegetation will be re-established on the removed roadbed. Therefore, the net long-term disturbance to denning habitat will be minimal.
4. Matrix habitat occurring between patches of boreal forest in close juxtaposition allowing travel by Canada lynx - Both projects lie within contiguous boreal forest. The action will not interfere with travel by Canada lynx or result in the creation of corridor gaps impeding the ability of Canada lynx to travel from one location to another.

Mn/DOT determined that the proposed action may affect, but is not likely to adversely affect Canada lynx. The Fish and Wildlife Service (Service) has evaluated the proposed action and found that due to the small area of roadside vegetation to be cleared and the restoration of the removed sections of TH1/169, the proposed action would not reduce or remove understory vegetation within boreal forest stands on a scale proportionate to the large landscape used by lynx. For the same reason, the proposed action would not result in the permanent loss or conversion of the boreal forest on a scale proportionate to the large landscape used by lynx. The proposed action would not increase traffic volume and speed on roads that divide lynx critical habitat. The proposed action would not create a barrier or impede lynx movement between patches of foraging habitat and between foraging and denning habitat within a potential home range. Therefore, we concur with your determination that the project may affect, but is not likely to adversely affect Canada lynx or adversely affect designated critical habitat for Canada lynx.

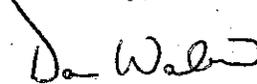
Mn/DOT determined that the proposed action may affect, but is not likely to adversely affect gray wolf or adversely affect critical habitat for gray wolf. The Service has evaluated the proposed action and determined that the proposed action would not increase human density or

density of roads, and would not reduce prey base for gray wolves. Therefore, we concur with your determination that the project may affect, but is not likely to adversely affect gray wolf or adversely affect designated critical habitat for gray wolf.

While the Service concurs with Mn/DOT's determinations, the Service recommends that the Mn/DOT collect data on road kill (wildlife species and numbers killed on a monthly basis over two years) along the proposed reconstructed sections of TH 1/169 and report results of this data collection to the FHWA, to the Minnesota Department of Natural Resources, and to our office. These data can be used to inform planning, operations, and maintenance decisions for future highway projects in northern Minnesota.

This concludes section 7 consultation for proposed construction at the above location. If project plans change, additional information on listed or proposed species becomes available, or new species are listed that may be affected by the project, consultation should be reinitiated. Thank you for your cooperation in meeting our joint responsibilities under section 7 of the Endangered Species Act. If you have any further endangered species questions, please contact Nick Rowse of my staff at (612) 725-3548, ext. 2210, or by email at nick_rowse@fws.gov. We appreciate the opportunity to comment and look forward to working with you in the future.

Sincerely,



FOR Tony Sullins
Field Supervisor

cc: Nathan Kestner, Minnesota Department of Natural Resources, Bemidji, MN



Minnesota Department of Natural Resources

500 Lafayette Road
St. Paul, Minnesota 55155-4010

July 31, 2007

Cindy Lillegaard
MDOT District 1, Duluth
1123 Mesaba Ave.
Duluth, MN 55811

RE: Response to MnDOT Early Notification Memo Requesting Information and Early Coordination Regarding Reconstruction of TH 1 (SP 6904-46) & TH 169 (SP 6936-17), Saint Louis County

Dear Ms. Lillegaard:

The Minnesota Department of Natural Resources (DNR) has completed review of the information submitted in the MnDOT Early Notification Memo regarding the proposed TH 1 and TH 169 reconstruction projects. MnDOT put these two projects together as they will be run through the EA/EAW process under one document. TH 1 is being proposed to have a realignment west of Tower (near Armstrong Lake), and TH 169 is proposed to be reconstructed south of Peyla on the existing alignment, both in St. Louis County. The following comments were submitted to me during DNR field review of the project:

1. Both projects cross Public Waters and will require DNR permits:
 - a. TH 1 will have a new crossing of Armstrong Creek. Exactly where is not known. The supplied document showed a possible alignment, though it is not certain by any means. Armstrong Creek is a Public Waters and a crossing would require a Public Waters Work Permit.
 - b. TH 169 has a crossing of the Pike River, and one of its tributaries. These are both Public Waters and a new or reconstructed crossing would require a Public Waters Work Permit.

Work at these crossings may qualify for authorization under General Permit (GP) 2004-0001 should the conditions of the permit be met. As this project is still pretty much in the concept phase, it is too soon to address detailed concerns. Though as the project moves forward, design of the crossings should meet the conditions listed in the GP. Public Waters Permit requirements guidance on concerns may be found in the Manual "Best Practices for Meeting DNR General Public Waters Work Permit GP 2004-0001". A pdf version of this manual may be found at: http://files.dnr.state.mn.us/waters/watermgmt_section/pwpermits/DNR_GP_Guidance_Manual.pdf

Design considerations and information on specific GP conditions are:

- GP 2004-0001 Condition #12: It is assumed the crossings will be of a similar construction and will have a similar cross-sectional area for stream flow. However, a hydrologic report, including 2yr velocities, will be required for review prior to authorization under the GP.
- GP 2004-0001 Condition #18A: For construction purposes, Work Exclusion dates for non-trout streams in DNR Region 2 is April 1 through June 30.
- To meet DNR Erosion and Sediment control requirements, NPDES construction site requirements shall be followed regardless if the NPDES permit is required or not.

Please contact me as soon as possible in order to identify further design needs of this project for authorization under the GP.

2. State lands exist in and near the project area:
 - a. The Hwy 1 realignment project will affect state land in Sec 16-T62-R14. There is no Old Growth timber listed for this section. Timber damages will depend upon width of the new right of way. DNR Forestry is

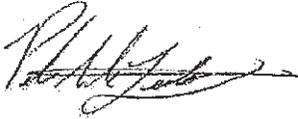
also interested in access points to the area should the project allow. Please contact Mike Magnuson, DNR Forestry, phone: 218-753-2580 (x 261), mike.magnuson@dnr.state.mn.us as the project design proceeds

- b. Hwy 169 project may affect State land in Sec 16-T61-R16 if the project goes beyond the existing r/w. We have no Old Growth timber listed for this section.
3. DNR Trails and Waterways requests some consideration in the TH 169 design for providing access to the Pike River south of Peyla. For more information on this request, please contact Scott Kelling, Supervisor Tower Area Trails and Waterways, phone (218) 753-2580, email scott.kelling@dnr.state.mn.us
4. The Minnesota Natural Heritage Information System has been reviewed to determine if any rare plant or animal species, native plant communities, or other significant natural features are known to occur within an approximate one-mile radius of the TH 1 (SP 6904-46) & TH 169 (SP 6936-17) project area. Based on this review, there are 2 records of rare features in the area searched (for details, please see the cover email for database printouts). However, based on the nature and location of the proposed project, we do not believe it will negatively affect any known occurrences of rare features.

Because our information is not based on a comprehensive inventory, there may be rare or otherwise significant natural features in the state that are not represented in the database. A county-by-county survey of rare natural features is now underway, and is in progress for St. Louis County. Our information about native plant communities is, therefore, good for this county. However, because survey work for rare plants and animals is less exhaustive, and because there has not been an on-site survey of all areas of the county, ecologically significant features for which we have no records may exist on the project area.

If you have questions regarding this letter, please e-mail me at peter.leete@dot.state.mn.us or call at (651) 366-3634.

On behalf of the DNR
Sincerely,



Peter Leete
Transportation Hydrologist
Office of Environmental Services, mail stop 620
Minnesota Department of Transportation
395 John Ireland Blvd.
St. Paul, MN 55155

C: ERDB file 20070802