



W.J. McCABE (DULUTH) CHAPTER IZAAK WALTON LEAGUE OF AMERICA

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September 4, 2025

Eric Johnson
Community Development Director
City of Hermantown
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RE: Draft Hermantown Industrial Alternative Areawide Review (AUAR)

These comments are submitted on behalf of the W.J. McCabe chapter of the Izaak Walton League of America. The McCabe Chapter, based in Duluth, is a big picture organization, working to protect whole watersheds, including the air and water quality, the fish and wildlife habitat, and to provide the opportunity for nature centered outdoor activities, especially for youth. The environmental quality of Lake Superior and the St. Louis River estuary and its watershed have been high priorities for our chapter throughout its 100-year history; hence our concern with the Hermantown Industrial Alternative Areawide Review (or AUAR) for 403 acres of undeveloped land in the Midway River watershed.

We believe the use of an AUAR for this site is inappropriate and contrary to the intent of Minnesota Rules 4410.3610. The AUAR process is generally understood to be a tool to facilitate urban redevelopment in areas such as brownfields; its use here appears to be a way to avoid an Environmental Impact Statement, which would logically be expected for a proposal to develop an acreage of this size that is not an urban area and is largely undisturbed or restored agricultural land in a rural setting. In a Minnesota city of the third or fourth class such as Hermantown, Minnesota Rules require an Environmental Assessment Worksheet for light industrial development over 300,000 square feet, or an Environmental Impact Statement for light industrial development over 750,000 square feet. The proposed development of a single 1,800,000 square foot light industrial facility, as cited in a June 17, 2025 article in the Duluth News Tribune, exceeds all such limitations and necessitates review far beyond what is provided for in this AUAR process. The project description in the AUAR references multiple buildings, rather than a single building, for a total of 1.8 million square feet but the impact will be the same.

Of the 403 acres identified in the AUAR study area, 279 acres, or 70% of the proposed development area, is woodland or wetlands. Another 92 acres is identified as grassland/landscaped, bringing the total greenspace to 371 acres or 92% of the study area. The study proposes that 150 acres of mature trees will be cut down, half of the 55 acres of wetlands on the site will be destroyed, and impervious surface area will more than triple to 144 acres

(although this seems a low estimate for the estimated 1.8 million square feet of developed area). The project envisions “multiple buildings of varying sizes”, with no specific proposed end users or projects. In addition, approximately 2.3 million total cubic yards of excavation over 184 acres is envisioned, with runoff from the site flowing towards both West Rocky Run Creek and the Midway River. This is a massive disruption of the topography and landscape.

Among our primary concerns are the potential impacts on these two designated trout streams. West Rocky Run Creek, which flows through a portion of the site, is one of the highest quality cold water streams in our area. It is listed on the Minnesota Pollution Control Agency’s 2024 Impaired Waters List for elevated levels of *E. coli*, making any potential future impacts of greater risk to the surrounding area. Impact on West Rocky Run Creek and the Midway River due to the extensive proposed site excavation and destruction of surrounding wetlands is likely to be considerable and may result in permanent and irreversible impacts to water quality and habitat availability. Anticipated direct impacts on these streams will include increases in sedimentation, temperatures, salt, and other nutrients, which may also impact the health of the fishery, its surrounding upland environment, and its recreational value to the community.

Our other major concern is the cumulative effects of the proposed projects within the AUAR area in the watershed. Water and wastewater services from the project site are proposed to be extended through expansion of the City of Hermantown’s systems, which will require the existing infrastructure to be extended approximately 12 miles along Midway Road, an area not currently served by these systems. The extension of this service will undoubtedly result in additional development in this corridor, which could include (but not be limited to) increased impervious surfaces and associated run-off, noise pollution, air pollution, stream degradation, loss of trees and other vegetation, and habitat loss. These potential impacts should be acknowledged and the designated AUAR area, as approved by the Minnesota Environmental Quality Board, should include all new areas where water and wastewater extensions are proposed.

The *Cumulative Potential Effects* section of the AUAR is incomplete and inadequate, merely stating that “future public and private development projects may result in impacts on transportation, water resources, and utilities” and will be dealt with via permitting and approval processes. The limited description in this section fails to address any of the likely effects of the project and postpones any real analysis of the consequences to the environmental character of this area. One clearly identifiable potential effect is that the proposed extension of utilities and other investments in surrounding transportation systems by Hermantown and other jurisdictions, including possibly St. Louis County and the State of Minnesota, may well result in the complete urbanization of the Midway Road corridor between Interstate 35 in Midway Township and Trunk Highway 53 in Canosia Township. The potential resulting effects are cumulative and are tied to the City of Hermantown and the Hermantown Economic Development Authority’s intent for development in this area. Those lands should be included as part of this AUAR, if it is to proceed without further evaluation by the Responsible Governmental Unit (the RGU, in this case the City of Hermantown) or through other appropriate legal processes.

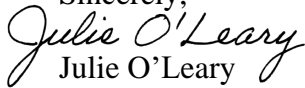
Similarly, the *Other Potential Environmental Effects* section of the study is limited to one sentence stating there “There are no other potential environmental effects that have not been addressed in preceding sections.” This is also inadequate. Because potential environmental effects are not sufficiently known or acknowledged, the *Draft Mitigation Plan* section is also inadequate. It lacks any detail or robust explanation of how impacts would be mitigated to

protect water and other natural resources, and the neighbors from noise, air pollution, and other impacts.

In summary, the project description in this AUAR is so vague and lacking in detail that it is difficult to know exactly what may be constructed on the site, what type of pollution, activities, and land uses will be conducted or generated there, and what effects they will have on the environment, the community and surrounding area. In spite of this, it is very clear that this project will be a large-scale land use change for the area and it is deserving of a thorough environmental review, which is not provided by the current AUAR process.

We encourage the City of Hermantown and the Hermantown Economic Development Authority to conduct a full and transparent process to evaluate the very significant impacts the proposed projects within the AUAR will have for the residents of Hermantown, surrounding communities within the Lake Superior watershed, and the natural and recreational resources in the region. As the RGU, the City of Hermantown must provide for a separate Environmental Impact Statement for any project within the AUAR area meeting the mandatory categories under Minnesota Rules, if such a project is not specifically addressed in the AUAR and mitigation measures adopted for it within the AUAR document.

Sincerely,

A handwritten signature in cursive script that reads "Julie O'Leary".

Julie O'Leary

On behalf of the W.J. McCabe Chapter, IWLA

jloinduluth@gmail.com

- The negative effects on streams and watersheds began with the settlement and development of Duluth and surrounding communities. Much of the lower sections of watersheds were impacted over time through the development of urban areas (by straightening of streams, draining and filling of wetlands, changing hydrology through road building and altering floodplains). In general, the headwaters areas have experienced a lesser amount of development and alteration than urbanized portions, and they provide many services critical to maintaining the overall health of the streams. Without intentional efforts to preserve resources necessary to maintain water quality, incremental degradation of streams will continue.

We appreciate the opportunity to review this Project. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit actions by the MPCA. Ultimately, it is the responsibility of the Project Proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this AUAR, please contact me by email at chris.green@state.mn.us or by telephone at 507-476-4258.

Sincerely,

Chris Green

This document has been electronically signed.

Chris Green, Project Manager
Environmental Review Unit
Resource Management and Assistance Division

CG:rs

Attachment

cc: Dan Card, MPCA (w/attachment)
Deepa deAlwis, MPCA (w/attachment)
Theresa Haugen, MPCA (w/attachment)
Jeffrey Hedman, MPCA (w/attachment)
Julie Henderson, MPCA (w/attachment)
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