MINNESOTA POLLUTION CONTROL AGENCY

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August 26, 2025

VIA EMAIL

Eric Johnson
City of Hermantown
5105 Maple Grove Road
Hermantown, Minnesota 55811
eric.johnson@hermantownmn.com

RE: Hermantown Industrial Alternative Urban Areawide Review (AUAR)

Dear Eric Johnson:

Thank you for the opportunity to review and comment on the AUAR for the Hermantown Industrial AUAR project (Project) located in Saint Louis County, Minnesota. The Project consists of an area totaling approximately 403 acres on 28 parcels in the City of Hermantown, Saint Louis County, Minnesota. The study area is bounded to the north by Morris Thomas Road, to the east by Midway Road and to the west by Solway Road. The southern boundary of the study area extends parallel to Saint Louis River Road, approximately 0.25 miles to the north. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

Watershed

- The development scenario will result in significant physical changes to the property (2.3 million cubic yards of excavation over 184 acres), but the AUAR lacks an adequate level of detail to evaluate the actual and potential environmental impacts and resulting effects created by the development. It is at the environmental review phase where important details such as site design, layout and scale are necessary to consider the project impacts in totality. Without these details, a greater burden is placed on permitting aspects, which typically examine the different components in isolation, rather than from an integrated perspective that environmental review provides.

Section 8., Cover Types

- It is not clear from the AUAR the extent to which the proposed changes in land cover types are incorporating avoidance and minimization of environmental impacts, or the location of proposed changes in proximity to wetlands and streams. Please provide additional detail describing the avoidance of existing environmental constraints (e.g., wetlands and streams) and how that is factored into the proposed changes in land cover types. For example, the development scenario proposes to permanently eliminate 29 acres if wetlands and seems to ignore the environmental services they provide.

Section 12., Subsection a.i., Surface Water

- The stream segment located in the southeast portion of the study area is an Unnamed Creek (Midway River Tributary), stream segment 04010201-685. The MPCA data indicate that the

entire stream segment (from the headwaters of segment 685 to the confluence with the Unnamed Creek, segment 682) is designated as a general coldwater stream (trout stream). Figures 13 and 17 incorrectly display only that portion of the stream in section 32 as a trout stream; however, the entire stream segment (685) that extends west into section 31 is also designated a coldwater stream.

- As indicated in the AUAR, Unnamed Creek (West Rocky Run Creek), stream segment 04010201-625 is a coldwater stream (trout stream) and was listed as impaired in 2012 for aquatic recreation due to elevated levels of *Escherichia coli (E. coli)* bacteria. A total maximum daily load study was completed by the MPCA and approved by the United States Environmental Protection Agency in 2018.
- Both streams are located within the larger Midway River Watershed and drain to the Midway River, also a coldwater stream (trout stream). Coldwater species, including brook trout, are an important indicator of water quality because they represent the condition of their aquatic environment (i.e., they live in the water and experience those conditions affecting water quality). A recent report by the MPCA, Midway River Watershed Protection Study (MPCA, August 2025) provides a detailed analysis of the Midway River and Tributaries, including existing conditions, vulnerabilities and potential projects for protection and restoration. The study may provide additional information and context for the Midway River Watershed, including streams on or near the development site.
- Trout streams, in essence, are more than the sum of their parts. A number of key components and conditions are needed for trout and coldwater obligate species to exist and thrive. These include clean, cold and clear water, higher level of dissolved oxygen, appropriate habitat conditions such as gravel substrate for spawning, an ability to move within s stream for lifecycle needs and areas for refuge when ideal conditions are diminished. It is not only the groundwater from the glacial sediments, the retention and release of water from wetlands, the high degree of water quality, the dynamic stability of the stream channels or the intact floodplain and riparian areas; all are needed in some combination to possibly result in a viable trout stream.

Section 12., Subsection b.ii., Stormwater

- The proposed development has the potential to significantly alter the existing water resources and water quality on the site. Hydrology will be changed through increased impervious surfaces (increasing temperatures, volumes, rates and timing of stormwater runoff), pervious surfaces (areas for stormwater detention, infiltration) will be eliminated, wooded areas/forest canopy (provides shading, water uptake, along with organic matter and woody debris to streams) will be significantly reduced, with a fraction of new trees being planted. These changes may also affect the groundwater – surface water interaction for the streams and those wetlands not proposed for impact, potentially making them more vulnerable to degradation. The Project will also increase pollutants often generated from development (increased runoff temperatures, increased sediment, oils and grease, deicing compounds, trash). While the AUAR cites permitting requirements and best management practices, concerns and unknowns remain on whether these actions on stormwater management will be adequate to be protective of the water resources.

Section 21., Cumulative Potential Effects

- The extension of public utilities (drinking water and sanitary sewer) into an area without these utilities presents a high likelihood that future development of adjacent properties will be facilitated.

- 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)
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