

September 10, 2026

Eric Johnson
Community Development Director
City of Hermantown
5105 Maple Grove Road
Hermantown MN 55811

RE: Hermantown Industrial Alternative Urban Areawide Review (AUAR) Follow-up

Dear Mr. Johnson,

Thank you for your September 4th letter that provides additional information on the Updated Hermantown Industrial Alternative Urban Area Wide Review (AUAR). Your letter provides important clarity regarding the AUAR and responds directly to Minnesota Department of Natural Resources' (DNR) comments in our August 25th and September 3rd letters and discussed during our September 2nd meeting.

As clarified during our meeting, the DNR does not object to the AUAR but only seeks to offer our technical expertise and ensure that as projects are developed the City of Hermantown collects sufficient ground and surface water data to inform any needed mitigation measures. We appreciate the progress made in developing a monitoring and adaptive management plan. As a technical resource, we offer the following additional thoughts on that plan for your consideration.

- The collection of as much baseline data as reasonably possible – both temporal and spatial – is important to prioritize prior to construction activity to inform the mitigation plan and adaptive management strategies.
- Successful adaptive management plans identify the specific data or observation that indicates needed adaptation. Comparing monitoring data to baseline data can help identify adjustments that need to be made to avoid or mitigate impacts. The success of adaptive management strategies depends in part on the timely implementation of adaptations.
- Successful plans also often include pre-identified adaptations or mitigations to pursue if warranted, specifically as they relate to trout stream impacts, surface/subsurface groundwater interactions, groundwater recharge, and other direct or indirect watershed impacts. This provides transparency regarding specific plans to address potential impacts, ensures project proposers understand what may be required, and ensures appropriate adaptations can be implemented quickly to avoid or mitigate potential impacts.

- DNR is willing to serve as a forward-going technical advisor and appreciate working with the City of Hermantown as it clarifies roles and requested time commitments and identifies other agency participants in a technical advisory process.

Thank you again for the additional information. The DNR appreciates the collaborative effort to address our comments and concerns. We look forward to our continued engagement.

Sincerely,

Melissa Kuskie
Ecological and Water Resources Division Director