



Ecological and Water Resources
2115 Birchmont Beach Rd NE
Bemidji, MN 56601

August 7, 2026

Andrea Poole
Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001
Environmental Filing Docket No. AB 497 (Sub-No. 8X)

Re: Minnesota Northern Railroad – Norman and Polk Counties, MN

Dear Andrea Poole,

The Minnesota Department of Natural Resources (MN DNR) appreciates the opportunity to review the proposed Minnesota Northern Railroad (MNN) Abandonment in Norman and Polk counties, MN. We offer comments on railroad prairies, potential trail development following abandonment, and bridges.

Railroad Prairies

More than 99% of the prairie that was present in Minnesota has been destroyed. The Minnesota DNR surveyed active [railroad rights-of-way for native prairie remnants](#) in the late 1990's, identifying the locations of remnant prairie along with their quality and type. Within the proposed abandonment area, a 1-mile section of Good quality mesic prairie was identified in Township 148, Range 48, Section 31, south of Climax, and a 1.5-mile area of Fair quality wet-mesic prairie was identified in Township 147, Range 48, Section 18-19 north of Nielsville.

The MN DNR recommends that the project be designed to avoid impacts to these ecologically significant remnant prairie areas. Actions to avoid or minimize disturbance include, but are not limited to, the following recommendations:

- As much as possible, operate within already-disturbed areas and confine construction activities to existing roads and railroad tracks.
- Minimize vehicular disturbance in the prairie areas and avoid parking equipment or stockpiling supplies or spoils in the prairie areas.
- Conduct the work under frozen ground conditions if possible.

- Use effective erosion prevention and sediment control measures. All erosion control materials should use only natural fibers with no plastic mesh to prevent wildlife entanglement.
- Inspect and clean equipment prior to operation and follow MN DNR recommendations to [prevent the spread of invasive species](#).
- As soon as possible after construction, revegetate disturbed soil with [native plants](#) appropriate to the [Red River Prairie Ecological Subsection](#) and consistent with the Minnesota Board of Water and Soil Resources (BWSR) [Vegetation Establishment and Management](#) guidance and [Minnesota Department of Transportation Erosion Control and Stormwater Management Vegetation guidelines](#).
- Use only weed-free mulches, topsoils, and seed mixes. Of particular concern are birdsfoot trefoil (*Lotus corniculatus*) and crown vetch (*Coronilla varia*), two invasive species that are sold commercially and are problematic in prairies and disturbed open areas.
- Refer to the [Minnesota Department of Transportation's Best Practices Manual](#) for recommendations pertaining to transportation projects.

Public and Trail Use

The southern portion of the MNN railroad line is currently used as the [FireFrost Trail](#), a state [Grant-in-Aid](#) Off-highway Vehicle trail maintained by the FireFrost ATV Club. The Club, in cooperation with a local government unit, may be interested in public trail use of the section proposed for abandonment. The FireFrost ATV Club contact is Edward Bergseid (218-329-0118, firefrostatv@gmail.com).

Bridges

Bridge structures over state [Public Waters](#) should be removed as part of railroad abandonment, unless the bridges will continue to be used for a public trail. Unmaintained bridges can pose public safety concerns and may affect flow conveyance and stream channel stability. Bridge removal or maintenance in or over Public Waters generally requires a MN DNR [Public Waters Work Permit](#).

We appreciate the opportunity to comment on the proposed project. Please contact me at owen.baird@state.mn.us with any questions.

Sincerely,



Owen Baird

Regional Environmental Assessment Ecologist, Ecological and Water Resources

Equal Opportunity Employer

Resources

Minnesota's Railroad Rights-of-Way Prairie: A Report to the 1999 Legislature

https://files.dnr.state.mn.us/eco/mcbs/publications/railroad_row_booklet_scan.pdf

MCBS Railroad Rights-of-Way Prairies – Minnesota Geospatial Commons

<https://gis.data.mn.gov/datasets/minnesota::mcbs-railroad-rights-of-way-prairies-1/about>

MN DNR Preventing the Spread of Invasive Species

<https://www.dnr.state.mn.us/invasives/dnrlands.html>

BWSR Native vegetation seed mixes

<https://bwsr.state.mn.us/seed-mixes>

MN DNR Red River Prairie Ecological Subsection

<https://www.dnr.state.mn.us/ecs/251Aa/index.html>

BWSR Vegetation Establishment and Management

<https://bwsr.state.mn.us/vegetation-establishment-and-management>

MnDOT Erosion Control and Stormwater Management

<https://www.dot.state.mn.us/environment/erosion/vegetation.html>

MN Best Practices Manual for Transportation Projects

https://www.dnr.state.mn.us/waters/watermgmt_section/pwpermits/gp_2004_0001_manual.html

FireFrost OHV Trail

https://www.dnr.state.mn.us/ohv/trail_detail.html?id=128

MN DNR Off-Highway Vehicle Grant-in-Aid Program

https://www.dnr.state.mn.us/grants/recreation/gia_ohv.html

MN Public Waters

https://www.dnr.state.mn.us/waters/watermgmt_section/pwpermits/pw_definition.html

MN DNR Public Waters Work Permits

https://www.dnr.state.mn.us/waters/watermgmt_section/pwpermits/requirements.html