



Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road
St. Paul, MN 55155-4040

January 26, 2026

Richard Davis
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Application of Big Bend Wind, LLC and Great River Energy for a Route Permit for a 161-kV high voltage transmission line and associated facilities in Martin County PUC Docket Number(s): IP7013/TL-25-389

To Whom It May Concern,

The Minnesota Department of Natural Resources (DNR) has reviewed the application for a route permit for the Big Bend Wind 161 kV high voltage transmission line (HVTL) project (Project), proposed by Big Bend Wind, LLC and Great River Energy (Permittees). Our agency offers the following comments:

Impact Mitigation

Tree Clearing Timing

The DNR recommends including a special permit condition requiring the Applicants to avoid tree removal from June 1 through August 15. This minimizes impacts to bats, including the federally endangered northern long-eared bat, during the maternity roosting season when pups are unable to fly.

Vegetation Management Plan

The DNR supports the permit condition requiring continued coordination with the Vegetation Management Plan Working Group (VMPWG) to refine the Project's Vegetation Management Plan (VMP). The VMP needs to specifically address the timing of vegetation removal, maintaining floodplain vegetation to the extent feasible, herbicide use, and minimizing impacts to sensitive areas. We

recommend that the Permittees file the VMP and documentation of the coordination efforts between the Permittee and the VMPWG, in addition to the DNR, with the Commission as part of the plan.

Lighting, Dust, Erosion Control

The DNR appreciates the Commission's inclusion of facility lighting, dust control, and wildlife-friendly erosion control as standard permit conditions.

DNR Permitting

Water Appropriation and Work in Public Waters

A DNR Water Appropriation Permit is required for all users withdrawing more than 10,000 gallons of water per day or 1 million gallons per year. A DNR Public Waters Work Permit is required for all projects involving development activities below the ordinary high water level in public waters and public waters wetlands. Both permits can be applied for in the [MNDNR Permitting and Reporting System \(MPARS\)](#).

Crossing Public Waters and State Lands

The DNR oversees the administration of designated public waters and state lands to ensure these resources are managed for the public's collective interest. A [Utility License Application](#) must be completed to obtain a license to cross these protected areas.

The DNR appreciates the opportunity to comment on the construction and operation of the proposed Big Bend Wind 161 kV HVTL project. Please contact me if you have questions about our agency's comments.

Sincerely,

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