



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

December 24, 2024

Larry Hartman  
Minnesota Department of Commerce  
85 Seventh Place East, Suite 280  
St. Paul, MN 55101

**RE: In the Matter of the Application of ITC Midwest LLC for a Route Permit for the 161 kV  
Transmission Line from Forks Substation to Rost Substation  
Docket Number: ET-6675/TL-24-232**

Dear Larry Hartman,

The Minnesota Department of Natural Resources (DNR) has reviewed the application for a Route Permit for the 161 kV Transmission Line from Forks Substation to Rost Substation (Project), proposed by ITC Midwest LLC (Applicant). Our agency offers the following comments:

#### **Rare Features: Natural Heritage Review**

As stated in the Natural Heritage Letter (MCE 2023-00566), a calcareous fen has been documented in the vicinity of the project. The DNR requests a special permit condition, similar to TL-23-159, that the Applicant must work with DNR to determine if any impacts will occur during any phase of the project. If the project is anticipated to impact any calcareous fens, the applicant must develop a Calcareous Fen Management Plan in coordination with the DNR, as specified in Minn. Stat. § 103G.223.

#### **Avian Flight Diverters**

Our agency commits to work with the Applicant to determine appropriate locations for avian flight diverters after the route is determined. Generally, the avian flight diverters will be needed at river crossings, fragmented forested patches, and near lakes and wetlands. The use of avian flight diverters will minimize the number of bird collisions with the transmission lines.

## **Facility Lighting**

The DNR recommends including a special permit condition, similar to TL-23-159, to utilize downlit and shielded lighting and minimize blue hue to reduce harm to birds, insects, and other animals. Potential project impacts related to illuminated facilities can be avoided or minimized by using shielded and downward facing lighting and lighting that minimizes blue hue.

## **Dust Control**

The DNR recommends including a special permit condition, similar to TL-23-159, to avoid products containing calcium chloride or magnesium chloride, which are often used for dust control. Chloride products that are released into the environment do not break down, and instead accumulate to levels that are toxic to plants and wildlife.

## **Wildlife-Friendly Erosion Control**

Due to entanglement issues with small animals, the DNR recommends including a special permit condition, similar to TL-23-159, that erosion control blankets be limited to “bio-netting” or “natural netting” types, and specifically not products containing plastic mesh netting or other plastic components. Hydro-mulch products may contain small synthetic (plastic) fibers to aid in its matrix strength. These loose fibers could potentially re-suspend and make their way into waterways.

The DNR appreciates the opportunity to comment on the construction and operation of the proposed 161 kV Transmission Line from Forks Substation to Rost Substation Project. Please contact me if you have questions about our agency’s comments.

Sincerely,

Samantha Bump  
Energy Projects Planner  
Samantha.Bump@state.mn.us  
651.259.5999

Attachments: Natural Heritage Letter

CC: Haley Byron

*Equal Opportunity Employer*