



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

February 19, 2026

Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Application of Great River Energy and Lake Region Electric Cooperative for a Route Permit for the Otto Tap 115 kV Transmission Line Project in Otter Tail County, Minnesota
PUC Docket Number: ET2/TL-25-269

To Whom It May Concern,

The Minnesota Department of Natural Resources (DNR) has reviewed the Route Permit and Environmental Assessment (EA) for the Otto Tap 115 kV transmission line project (Project), proposed by Great River Energy and Lake Region Electric Cooperative (Applicants). Our agency offers the following comments:

Impact Mitigation

Avian Protection

Incorporating avian flight diverters into transmission line design minimizes the likelihood of bird collisions attributed to visibility issues. The DNR supports the draft permit condition requiring the Applicants to use avian flight diverters and to coordinate with the DNR to determine optimal placement after the route is finalized. This includes incorporating adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to minimize the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices. The DNR concurs with the USFWS on the location of bird diverters near Albert Lake and other nearby wetlands.

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 draft 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 Otto Tap 115 kV transmission line project. Please contact me if you have questions about our agency's comments.

Sincerely,

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