



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

June 2, 2025

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

**RE: In the Matter of the Application of Great River Energy for a Route Permit Application for the  
Laketown 115-kV Transmission Line in Carver County, Minnesota.  
PUC Docket Number: ET2/TL-24-132**

To Whom It May Concern,

The Minnesota Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) for the Laketown 115 kV Transmission Line and Laketown Substation (Project), proposed by Great River Energy (Applicant). Our agency offers the following comments:

#### **Natural Heritage Review**

A Natural Heritage Review has been completed for the Project via the Minnesota Conservation Explorer (MCE 2023-00902). The DNR recommends including a special permit condition that the Applicant will comply with applicable requirements related to state-listed endangered and threatened species in accordance with Minnesota's Endangered Species Statute (Minnesota Statutes, section 84.0895) and associated Rules (Minnesota Rules, part 6212.1800 to 6212.2300 and 6134). This includes following the conditions listed in the letter to minimize or avoid impacts to state-listed species and other rare resources that have the potential to be impacted by the Project.

#### *Calcareous Fen*

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 the 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.

### **Vegetation Removal**

The DNR recommends including a special permit condition that the Applicant conducts winter tree clearing for the Project. Winter tree clearing minimizes impacts to nesting birds and roosting bats.

### **Avian Flight Diverters**

To prevent avian collisions due to visibility issues, the DNR recommends including a special permit condition, similar to TL-22-415, that the Applicant will coordinate with the DNR to determine appropriate locations for avian flight diverters after the route is finalized. 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 minimizes the number of bird collisions with the transmission lines. Standard transmission line design shall incorporate adequate spacing of conductors and grounding devices in accordance with Avian Power Line Interaction Committee standards to eliminate the risk of electrocution to raptors with larger wingspans that may simultaneously come in contact with a conductor and grounding devices.

### **Facility Lighting**

The DNR recommends including a special permit condition, similar to TL-22-415, 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 that also minimizes blue hue.

### **Dust Control**

The DNR recommends including a special permit condition, similar to TL-22-415, 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-22-415, 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.

## **Public Waters**

Public waters are designated as such to indicate which lakes, wetlands, and watercourses over which DNR has regulatory jurisdiction. Route Alternative C crosses a public water wetland (10020400) and Route Alternative D crosses a public water watercourse (M-055-020-001-001). As such a DNR Public Waters Work Permit or a DNR License to Cross may be required. The DNR supports an alternative that avoids crossing or working within these public waters.

## **Water Appropriation**

A DNR Water Appropriation Permit is required for dewatering activities during construction if the water pumped exceeds 10,000 gallons in a day and/or one million gallons in one year. The DNR General Permit for Temporary Appropriation, with its lower permit application fee and reduced time for review, may be used for the dewatering if the dewatering volume is less than 50 million gallons and the time of the appropriation is less than one year. A DNR Water Appropriation Permit can be applied for in the [MNDNR Permitting and Reporting System \(MPARS\)](#).

The DNR appreciates the opportunity to comment on the construction and operation of the proposed Laketown 115 kV Transmission Line and Laketown 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  
651.259.5828

Attachments: NHIS Review

*Equal Opportunity Employer*