



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

June 6, 2025

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 ITC Midwest LLC for a Route Permit for the 161-kilovolt (kV) Transmission Line from Forks Substation – Rost Substation Project
PUC Docket Number: ET6675/TL-24-232

To Whom It May Concern,

The Minnesota Department of Natural Resources (DNR) has reviewed the environmental assessment (EA) for the Forks to Rost Transmission Line and Switching Station (Project), proposed by ITC Midwest LLC (Applicant). Our agency offers the following comments:

Natural Heritage Review: Calcareous Fen

A Natural Heritage Review has been completed for the Project (MCE 2023-00566). As stated in the letter, 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.

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 Crossings

Public waters are designated as such to indicate which lakes, wetlands, and watercourses over which DNR has regulatory jurisdiction. The Project crosses two public water watercourses: the Little Sioux River and Judicial Ditch 28. As such, a DNR License to Cross may be required.

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 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 Forks to Rost Transmission Line and Switching Station. 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 Letter

Equal Opportunity Employer