

February 11, 2026

Ms. Sasha Bergman

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

RE: Vegetation Management Plan  
Lyon County Generating Station Project  
**PUC Docket No.** E002/CN-25-145, E002/TL-25-161, G002/GS-25-154, G002/GP-25-163  
**CAH Docket No.** 5-2500-41123

Ms. Bergman:

The VMPWG has reviewed the Environmental Assessment (EA), the draft site permit (DSP) and draft route permits (DRP) for Xcel Energy's (applicant) proposed Lyon County Generating Station Project (project). The VMPWG supports permit condition 5.3.10 of the DRP for the proposed project's transmission lines and associated facilities. Permit condition 5.3.10 requires the applicant to develop a vegetation management plan for the proposed project's transmission lines in coordination with the VMPWG using best management practices established by the DNR and BWSR.

The VMPWG recommends adapting permit condition 5.3.10 into a special permit condition requiring the applicant to develop a vegetation management plan for all areas not used for permanent facilities within the entire project footprint (the generation facilities, the transmission lines, and the natural gas pipeline). The special permit condition should include additional language identifying the information to be included in the vegetation management plan. The VMPWG proposes the vegetation management plan special condition read as follows:

#### **Vegetation Management Plan**

The Permittee shall develop a vegetation management plan (VMP), in coordination with the VMPWG, using best management practices established by the DNR and BWSR. The VMP shall address all areas not used for permanent facilities within the Lyon County Generating Station footprint. The Permittee shall file the VMP and documentation of the coordination efforts between the Permittee and the coordinating agencies with the Commission at least 14 days prior to the pre-construction meeting. The VMP must include the following information for the generation facilities (site) and the transmission lines and pipelines (routes):

- (a) management objectives addressing short term (year 0-5, seeding and establishment) and long term (year 5 through the life of the Project) goals for the site and routes;

- (b) a description of planned restoration and vegetation management activities, including how the site and routes will be prepared, timing of activities, how seeding will occur (e.g., broadcast, drilling, etc.), and the types of seed mixes and vegetation to be used, including:
  - a. temporary seed mixes and cover crops,
  - b. permanent seed mixes,
  - c. and native shrub species that will serve as windbreaks and snowbreaks along the boundaries of the project;
- (c) a description of how the site and routes will be monitored and evaluated to meet management goals;
- (d) a description of the management tools used to maintain vegetation (e.g., mowing, spot spraying, hand removal, etc.) within the site and routes, including the timing and frequency of maintenance activities;
- (e) identification of the third-party (e.g., consultant, contractor, site manager, etc.) contracted for restoration, monitoring, and long-term vegetation management of the site and routes;
- (f) identification of noxious weeds and invasive species (native and non-native) within the site and routes and the monitoring and management practices to be utilized; and
- (g) a marked-up copy of the project Site Plan and rights-of-way Plan and Profile showing how the site and routes will be revegetated and identifying the corresponding seed mixes and native shrub species. Best management practices should be followed concerning seed mixes, seeding rates, cover crops, and shrub selection.

## Vegetation Management Plan Recommendations

The VMPWG is committed to working with applicants and permittees to ensure that site and route restoration is successful. The VMPWG proposes the following restoration recommendations for the project footprint and encourages Xcel Energy to incorporate these recommendations in its pre-construction VMP submittal:

### Vegetation Management Units

The VMPWG recommends the applicant define individual project vegetation management units (VMUs) for the areas planned for restoration within the generation site, transmission line routes, and pipeline route. The VMP should identify and describe any vegetation requirements and/or maintenance standards for VMUs that are necessary for the safe operation of the project, such as the removal of vegetation that poses a threat to project transmission lines or the clearing of vegetation to allow for visual inspection of the project pipeline.

### Agricultural Use

The VMPWG recommends that all impacts to adjacent agricultural land be mitigated as outlined in the Agricultural Impact Mitigation Plan, in particular, any disturbance of surface or subsurface drainage systems that have the potential to impact adjacent agricultural operations and/or landowners. Any off-site disturbance to soils, such as potential excavations or compaction would also need to be mitigated.

## Native Vegetation

The VMPWG recommends the use of a seed mix that contains a diverse mix of native forbs and grasses. The applicant indicated that they plan to revegetate areas that do not contain permanent facilities through broadcast seeding of a native seed mix containing primarily native grasses. The VMPWG appreciates the inclusion of native grasses, but encourages the applicant to also prioritize planting native forbs, as the inclusion of forbs in the seed mix could improve habitat and reduce erosion.

In summary, the VMPWG looks forward to the successful restoration of the Lyon County Generating Station and recommends the Commission include the proposed special condition requiring the applicant to prepare a vegetation management plan for the entire project footprint. The applicant is encouraged to coordinate with the VMPWG to develop and finalize the vegetation management plan. The VMPWG will provide additional review and recommendations to the Commission as part of PUC EIP staff pre-construction compliance review.

The VMPWG appreciates the opportunity to comment on the proposed Lyon County Generating Station.

Sincerely,



Lauren Agnew  
PUC EIP Environmental Review Manager



Jessica Livingston  
PUC EIP Environmental Review Manager

CC:

Vegetation Management Planning Working Group

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Vegetation Management Planning Working Group Comments  
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