

October 31, 2025

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  
Castle Rock Solar Project  
**PUC Docket No:** IP-7137/GS-24-267  
**CAH Docket No:** 65-2500-40800

Ms. Bergman:

PUC EIP staff, on behalf of the interagency Vegetation Management Planning Working Group (VMPWG), respectfully submits comments on the Vegetation Management Plan (VMP) proposed by Castle Rock Solar, LLC (Castle Rock Solar).

The VMPWG has reviewed the draft VMP for the proposed Castle Rock Solar Project (project) included as Appendix E of the Site Permit Application filed January 16, 2025.<sup>1</sup> The VMPWG does not recommend any action by the Minnesota Public Utilities Commission (Commission) at this time but is providing comments to facilitate transparency in the record as the VMPWG works with Castle Rock Solar to arrive at a VMP that is adequate to meet pre-construction compliance filing requirements.

Overall, the plan for site restoration and implementation appears to be achievable to meet the anticipated permit conditions and the applicant's objectives to:

- Establish low-growing, regionally appropriate grasses within the arrays and associated buffers
- Minimize the presence of noxious weeds and
- Protect adjacent natural areas from impacts during construction and operation of the Project facility

The VMPWG is committed to working with applicants and permittees to ensure that site restoration is successful and meets the goals laid out in the management plan. The VMPWG provides these specific comments on the plan and recommends that Castle Rock Solar address these comments in its pre-construction VMP submittal:

---

<sup>1</sup> Castle Rock Solar, *Site Permit Application: Castle Rock Solar Project. Appendix E: Vegetation Management Plan*. January 16, 2025, eDocket No. [20251-214065-08](#).

## General Comment

- The VMPWG is aware that two additional parcels have been incorporated into the project. The applicant should ensure that the information and figures in the final VMP have been updated to include the additional parcels.

## Management Areas

- The applicant has identified two management areas that will include different seed mixes, the pollinator mix and the solar array mix. The VMPWG recommends the applicant further splits up the VMP into other management areas based on the differing establishment and management strategies and requirements.
- The applicant is advised to include detail on how sensitive areas, such as those adjacent to Native Plant Communities (NPC), Minnesota Biological Survey (MBS) sites, or within stormwater ponds and vegetated swales, will be managed in comparison to the areas that will be more disturbed. The applicant should consult with the Department of Natural Resources (DNR) regional plant ecologist and follow directions/guidance in the Natural Heritage letter when conducting establishment and/or management activities within or adjacent to the MBS Site/NPC.

## Site Preparation

- The different vegetation management areas may require different site preparation methods due to characteristics such as soil properties or temporary saturation. The applicant should clarify specific site preparation techniques and/or equipment that may be required in each management area or under certain circumstances.
- The applicant is advised to avoid tree and shrub clearing during restricted times in order to comply with protected species regulations. The VMP should clarify when vegetation clearing will occur, including any anticipated tree or shrub removal, and identify measures in place to avoid impacts to protected species identified in the DNR's Natural Heritage letter.
- The applicant indicates that soil testing will be done to determine if pesticide residue is present. The VMPWG recommends that the applicant also conduct soil testing to assess the presence of herbicide residue. In addition to soil testing, the applicant is advised to verify the chemical application history of the site, using both assessments to determine if special methods will be necessary to allow for successful native vegetation establishment. If chemical carryover is likely and native seeding cannot be delayed due to construction schedules, supplemental seeding may play an important role in subsequent years in areas with poor establishment.
- It is generally advised to avoid the use of mulch or erosion control materials that contain plastic netting and/or malachite green dye, including within hydroseed mulch. The applicant is recommended to use straw mulch to cover topsoil as a wildlife friendly choice.

## Seed Installation

- Additional information is needed about the potential use of cover crops. Cover crops are often used to stabilize soils and reduce weeds during site restoration. In addition to suppressing weeds, cover crops also can suppress and reduce germination of desired species. The applicant is advised to consult with the VMPWG when integrating cover crops with seed mixes.
- If hydroseeding is used, native seed should be applied in water first before a tackifier. Native seed should not be mixed in the tackifier, as this can inhibit seed to soil contact.

## Seed Mixes

- The project site contains areas of soils classified as poorly drained or very poorly drained, creating a likelihood that these soils will retain moisture. The areas of the site with poorly drained soils would benefit from the addition (or substitution for dry habitat species) of additional moist soil species to the mix such as Canada Blue-joint grass, fowl manna grass, and fowl bluegrass to help ensure successful establishment. [BWSR's Solar Moist Soils](#) seed mix is an example that contains species that can be used in the site, or as a model to develop a seed mix.
- The applicant has indicated that it will approve any seed mix substitutions in order to remain consistent with the stated goals and objectives of the VMP, and substitutions will be chosen using BWSR and MnDOT substitution lists. The applicant is advised to select and provide a list of seed mix substitutions ahead of time to the VMPWG for review, in order to ensure that original vegetation management objectives will be met. This will allow for the VMP to continue as planned in the case that there are shortages of individual species. In the event that substitutions are to be used, EIP staff and partner agencies request that the applicant provide the list of final substitutions to the VMPWG to review prior to seeding. The goal is to ensure that the ecological niche and guild of a plant species is retained when substitutions are necessary.
- The VMPWG recommends the applicant use seed mixes that meet the DNR's high-diversity standards, as high diversity plantings have a better chance at long-term health and self-sustainability compared to mid-diversity plantings. In addition, high-diversity seed mixes provide maximal ecosystem benefits.
- The VMP indicates that the pollinator mix will be planted in the MBS Site/NPC located within the project. The applicant should work with the DNR plant ecologist on the needs of this plant community. The seed mix used in the MBS Site/NPC will need to be specific to the NPC type. Management steps can be taken to maintain or avoid the MBS Site completely.

## Visual Screening

- The applicant should clarify whether vegetative screening will be utilized for this project, as the use of vegetative screening will require the development of a visual screening plan. The visual screening plan should provide a complete list of the species to be planted and the size of plant material, summarize the planned planting methods for all trees and shrubs, and include

guidance for ensuring that plants are installed using best practices. Native species should be used for vegetative screening. The visual screening plan can be referenced in the VMP or included as an appendix to the plan.

## Mowing and Haying

- The applicant indicates that mowing will be done periodically based on site conditions. Ideally, mowing should be done in response to shading needs rather than on a consistent schedule. This allows plants to flower for pollinators and allows for the overwintering of some pollinators in plant stems. The applicant should consider leaving a percentage of dormant plants intact for overwintering pollinators.
- Mowing should be timed to avoid impacts to wildlife, such as ground-nesting birds and butterflies. The applicant should indicate any restrictions for mowing and haying in compliance with listed species requirements or special conditions. Measures can be taken to avoid destroying ground-nesting bird nests during the nesting season (May 15 – August 1). If haying is utilized, it should occur after the nesting season for grassland birds (May 15 – August 1) and should be done at a raised height.
- For mechanical mowing and haying, hayed/mowed vegetation should be bagged and removed off site to prevent smothering new growth.

## Grazing

- The applicant indicated that grazing is not currently proposed for this project. If grazing is to be utilized, a grazing plan will be developed. The plan should summarize the goals of grazing, the type and number of animals to be used, plans for fencing, the time and duration of grazing, and the decision-making process for ensuring that vegetation is not over-grazed. The grazing plan should include adequate rest after defoliation of at least 30 calendar days and should influence refugia, so the entire site is not defoliated at one time. Drought contingency plans should be developed to avoid overgrazing during extreme conditions.

## Herbicide Use and Weed Control

- Mowing can increase the presence of noxious weeds, and the mower can spread these species throughout the site. The use of mowing to prevent the development of noxious, invasive, and woody plants should be approached with caution.
- The applicant has provided information about herbicide type. The VMP must also provide additional information about anticipated herbicide use, including surfactant rate, and frequency.
- Managing weeds is important in establishing native vegetation. Weed control through herbicide management should only include spot treatments, not broadcast spray, and it is recommended that spot treatments be required, not preferred, as a management technique. The applicant is advised that widespread application of herbicides may act as a pre-emergent and reduce

germination of desired vegetation. In this VMP, the applicant intends to use a temporary cover crop. This can be beneficial by reducing the need for herbicide application and therefore reducing the potential for spray drift to impact neighboring plant communities.

- The applicant has indicated that no tree removal or woody vegetation removal is planned. In the case that tree removal should occur, the applicant should provide additional information about the method of control for trees and shrubs, including the anticipated use of both mechanical and chemical techniques and the conditions in which said techniques are appropriate. Include details on how woody materials, brush, and stumps will be removed from the site. Describe the disposal method of removed woody vegetation.

## Management

- Management strategies are provided for the general plan. Management strategies should be tailored to each management unit, including any specific requirements or restrictions in sensitive and unique areas (wetlands, MBS sites, etc.).

## Monitoring and Reporting

- The applicant indicates that an annual monitoring report will be created annually through the life of the permit, and through the growing season, in order to inform the next year's work. The applicant is advised to submit their annual reports to the Commission. An annual monitoring report allows for VMP revisions based on any shortcomings or challenges faced during the reporting period. The annual report will be key to keeping the VMP "alive" and on track for successful implementation and long-term success. The applicant describes annual monitoring and reporting that will be conducted throughout the project lifetime. Annual monitoring reports for each growing season should be filed with the Commission on a yearly basis.

## Habitat Friendly Solar Program

- The VMPWG recommends that the applicant enroll this project in the state's [Habitat Friendly Solar Program](#). Enrollment in the program will highlight the habitat establishment at the project and make the site eligible for MRETS credits.

## Updates to the Vegetation Management Plan

- The VMPWG understands that Castle Rock Solar is still finalizing aspects of the VMP and requests that Castle Rock Solar continue to coordinate with EIP staff and other state agencies as the VMP is finalized prior to construction.

In summary, EIP staff recommend that the applicant continue to coordinate with the VMPWG as it finalizes the vegetation management plan, including the development of native seed mixes and substitutions suitable for the site, refinement of the installation, management, and monitoring plans, annual reporting details, and further clarification of project-specific details and management units. The VMPWG looks forward to the successful site restoration of the Castle Rock Solar Project. The VMPWG

will provide additional review and recommendations to the Commission as part of EIP staff pre-construction compliance review.

The VMPWG appreciates the opportunity to comment on the proposed Castle Rock Solar Project.

Sincerely,



Lauren Agnew  
PUC EIP Environmental Review Manager



Jessica Livingston  
PUC EIP Environmental Review Manager

CC:

Vegetation Management Planning Working Group

Rich Davis, PUC EIP, Environmental Review Manager

Suzanne Steinhauer, PUC EIP, Environmental Review Manager

Emily Johnson, PUC EIP, Environmental Review Manager

Tina Markeson, DOT, Roadside Vegetation Management Unit Supervisor

Dan Shaw, BWSR, Senior Ecologist and Vegetation Specialist

Erin Loeffler, BWSR, Ecological Science Conservationist

Jason Beckler, BWSR, Ecological Science Conservationist

Becky Marty, DNR, Regional Ecologist – Northwest Region

Owen Baird, DNR, Regional Environmental Assessment Ecologist – Northwest Region

Megan Benage, DNR, Regional Ecologist – South Region

Genevieve Brand, DNR, Assistant Regional Ecologist – South Region

Haley Byron, DNR, Regional Environmental Assessment Ecologist – South Region

Melissa Collins, DNR, Regional Environmental Assessment Ecologist – Central Region

Vegetation Management Planning Working Group Comments

PUC Docket No: IP-7137/GS-24-267

CAH Docket No: 65-2500-40800

Jessica Parson, DNR, Regional Environmental Assessment Ecologist – Northeast Region

Martin Donovan, DNR, Energy Review Planner

Samantha Bump, DNR, Energy Review Planner

Todd Smith, MPCA, Stormwater Engineer

Stephan Roos, MDA, Environmental Planner

Sam Lobby, PUC, Public Advisor