Appendix P

Native Prairie Assessment

DESKTOP NATIVE PRAIRIE ASSESSMENT

Cottage Grove BESS Project

City of Cottage Grove, Washington County, Minnesota

MARCH 18, 2026

PREPARED FOR:

LSP CG Storage LLC
917 Tahoe Blvd, Ste 202
Incline Village, NV 89511

PREPARED BY:

Westwood

Westwood

Desktop Native Prairie Assessment

Cottage Grove BESS Project

City of Cottage Grove, Washington County, Minnesota

Prepared For:

LSP CG Storage LLC
917 Tahoe Blvd, Ste 202
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1. Introduction

Westwood Professional Services, Inc. (Westwood) was retained by LSP CG Storage LLC to evaluate the proposed Cottage Grove BESS Project (Project) for locations of existing native prairie and areas with a high potential native prairie (PNP). The area under study and consideration for development covers 6.84 acres (Project Area) of varying intensities of developed and industrial land located in Township 021 North, Range 020 West, Sections 27 in City of Cottage Grove, Washington County, Minnesota (**Exhibit 1**).

The following presents the desktop assessment for potential native prairies completed for the Project by Westwood.

2. Native Prairie Definition and Assessment Methodologies

The native prairie community types considered in this assessment include dry prairie, mesic prairie, and wet prairie (MNDNR No Date - A). Native prairie, as defined by Minnesota Statutes, Section 84.02, Subdivision 5, means:

> *"(1) land that has never been plowed where native prairie vegetation originating from the site currently predominates or, (2) if disturbed, is predominantly covered with native prairie vegetation that originated from the site. Unbroken pastureland used for livestock grazing can be considered native prairie if it has predominantly native vegetation originating from the site and conservation practices have maintained biological diversity."*

To identify locations of PNP, Westwood conducted an initial desktop screening within the Project Area.

To identify existing records of native prairie, or areas with high potential for native prairie remnants, Westwood used several GIS data layers overlain on aerial imagery to identify areas given special designation or contain certain features which may indicate PNP. The layers and their purpose include the following:

- **MNDNR Minnesota Biological Survey (MBS) Sites of Biodiversity Significance:** to identify significant prairie areas
- **MNDNR Native Plant Communities (NPC):** to identify areas classified as native prairie communities
- **MNDNR Regionally Significant Ecological Areas (RSEA):** to identify any suspect prairie areas recognized by the MNDNR as having significant ecological value
- **MBS Railroad Rights-of-Way (ROW) Prairies:** to identify linear features along railroad tracks characterized as remnant prairies
- **MNDNR Potentially Undisturbed Land (Virgin Sod):** to identify untilled, unfarmed areas
- **USDA NRCS Conservation Reserve Program (CRP) lands:** to help determine lands previously enrolled in the CRP (based on publicly available data available prior to

2008)

- **USFWS National Wetlands Inventory:** to identify unfarmed wet meadow areas as potential native prairies (e.g. wet prairies)

Westwood then reviewed and photo-interpreted historic and contemporary aerial photography to identify PNP within the Project Area. Aerial imagery sources and years reviewed in the assessment include:

- **UMN Minnesota Historical Aerial Photographs Online:** 1936, 1945, and 1957
- **Google Earth™:** 1985, 1991, 2003, 2004, 2006, 2008, 2009, 2011, 2015, 2020, 2021, 2022, and 2023
- **MnGeo WMS Service:** 1991, 2003, 2006, 2008, 2009, 2010, 2013, 2015, 2017, 2019, and 2021

The most contemporary aerial photograph was used to initially identify all PNPs to be reviewed in historic aerial photography. PNPs were given a unique identification number and reviewed through each year as a means of evaluating sustained agricultural disturbance in PNP areas. Evidence of agricultural disturbance and other features sufficient to exclude areas from native prairie consideration included:

1. The presence of row crops or tilled land
2. Bare or developed ground
3. Areas in forest, wooded fencerows, or woodlots
4. Areas in more than 10 percent tree cover or 50 percent shrub cover
5. Wet meadows with clear signature of reed canary grass (*Phalaris arundinacea*)
6. Areas of open water or inundated wetlands such as marsh

Areas identified as PNPs were those that exhibited a history of grazing, haying, or other light disturbance, but did not appear to show evidence of ground disturbance that would be caused by routine plowing, disking, and/or the planting of a uniform crop.

3. Desktop Assessment Results

The GIS data layers reviewed for the assessment indicated no native prairies or ecological significant areas within the Project Area (**Exhibit 2**). Based on aerial imagery, the entire Project Area has been disturbed for row crop agriculture (**Exhibit 3**). Historical aerial photography from to 1936 to 1991 shows consistent agricultural use until the development of the electric generating facility was constructed. Historic imagery from 1957, 1945, and 1936 show the clearest evidence of tillage (UMN, 2015), and Google Earth's 1991 image shows the last agricultural use (**Exhibit 3**; Google Earth, 2025).

Summaries of findings from each GIS data layer are as follows:

- **MBS Sites of Biodiversity Significance (SBS):** No prairie SBSs were identified in the Project Area. Six were identified within the one-mile buffer of the Project Area with the closest SBS mapped 0.36 miles southeast of the Project Area.
- **NPC:** No NPCs are present in the Project Area. Four are located within the one-mile buffer of the Project Area with the closest mapped 0.50 miles southeast of the Project.
- **RSEA**: No prairie RSEAs are present in the Project Area. Five RSEA sites are located

within the one-mile buffer of the Project Area with the closest RSEA 0.05 miles north of the Project Area.

- **Railroad ROW Prairies:** No railroad ROW prairies are present in the Project Area or within the one-mile buffer of the Project Area. The nearest two are mapped 2.35 miles southwest and 3.45 miles northwest of the Project Area.
- **MNDNR Potentially Undisturbed Land:** Virgin sod data was unavailable for the Project Area and surrounding area.
- **CRP lands:** There is no CRP land mapped within the Project Area or surrounding area. The nearest mapped location of CRP enrolled land is 2.38 miles east of the Project Area.
- **NWI:** There is one NWI wetland located in the southwestern portion of the Project Area. It is listed as a freshwater emergent wetland. Several wetlands are located in the one-mile buffer of the Project Area. Listed wetlands according to NWI data are freshwater emergent, freshwater forested/shrub, freshwater pond, and riverine, and lake. These wetland types are generally not associated with prairies thus making it unlikely potential prairies would be present.

4. Conclusion

No PNPs were identified from the desktop evaluation. Based on available information, the entire Project Area was disturbed for row crop agriculture (1936 to 1991 aerial imagery) or the existing power generation facility. At this time, Westwood does not recommend an on-site evaluation for native prairie based on this assessment.

5. References

Google Earth Pro. 2025. Desktop Application. Version 7.3.6. Available at: https://www.google.com/earth/about/versions/

Minnesota Geospatial Information Office (MnGEO). 2021. Web Map Service (WMS). Historical Photos. Available at: https://www.mngeo.state.mn.us/chouse/wms/geo_image_server_agol.html

MN Geospatial Information Office (MnGEO). 2021. Original Public Land Survey Plats of Minnesota. Available at: https://www.mngeo.state.mn.us/chouse/GLO/index.html

MNDNR. 2005. Minnesota Native Plant Communities Classification. Available at: https://files.dnr.state.mn.us/natural_resources/npc/table.pdf.

MNDNR. 2011. Minnesota's Native Plant Community Classification: A statewide classification of terrestrial and wetland vegetation based on numerical analysis of plot data. Available at: https://files.dnr.state.mn.us/natural_resources/npc/npc_methods_paper.pdf.

MNDNR. 2015. Potentially Undisturbed Land (Virgin Sod) - FSA Common Land Unit Derived GIS Layer. Updated 2023. Available at: https://gisdata.mn.gov/dataset/env-potentially-undisturbed-land

MNDNR. 2017. MCBS Railroad Rights-of-Way Prairies GIS Layer. Updated 2023. Available at: https://gisdata.mn.gov/dataset/biota-mcbs-railroad-prairies

MNDNR. 2024. MBS Sites of Biodiversity Significance GIS Layer. Available at: https://gisdata.mn.gov/dataset/biota-mcbs-sites-of-biodiversity

MNDNR. 2024. MNDNR Native Plant Communities GIS Layer. Available at: https://gisdata.mn.gov/dataset/biota-dnr-native-plant-comm

MNDNR. No Date - A. Types of Prairie. Available at: https://www.dnr.state.mn.us/prairie/native/types-prairies.html

MNDNR. No Date – B. Native Vegetation at the Time of the Public Land Survey 1847-1907 GIS Layer. Available at: https://gisdata.mn.gov/dataset/biota-marschner-presettle-veg

University of Minnesota (UMN). 2015. Minnesota Historical Aerial Photographs Online. Available at: https://apps.lib.umn.edu/mhapo/

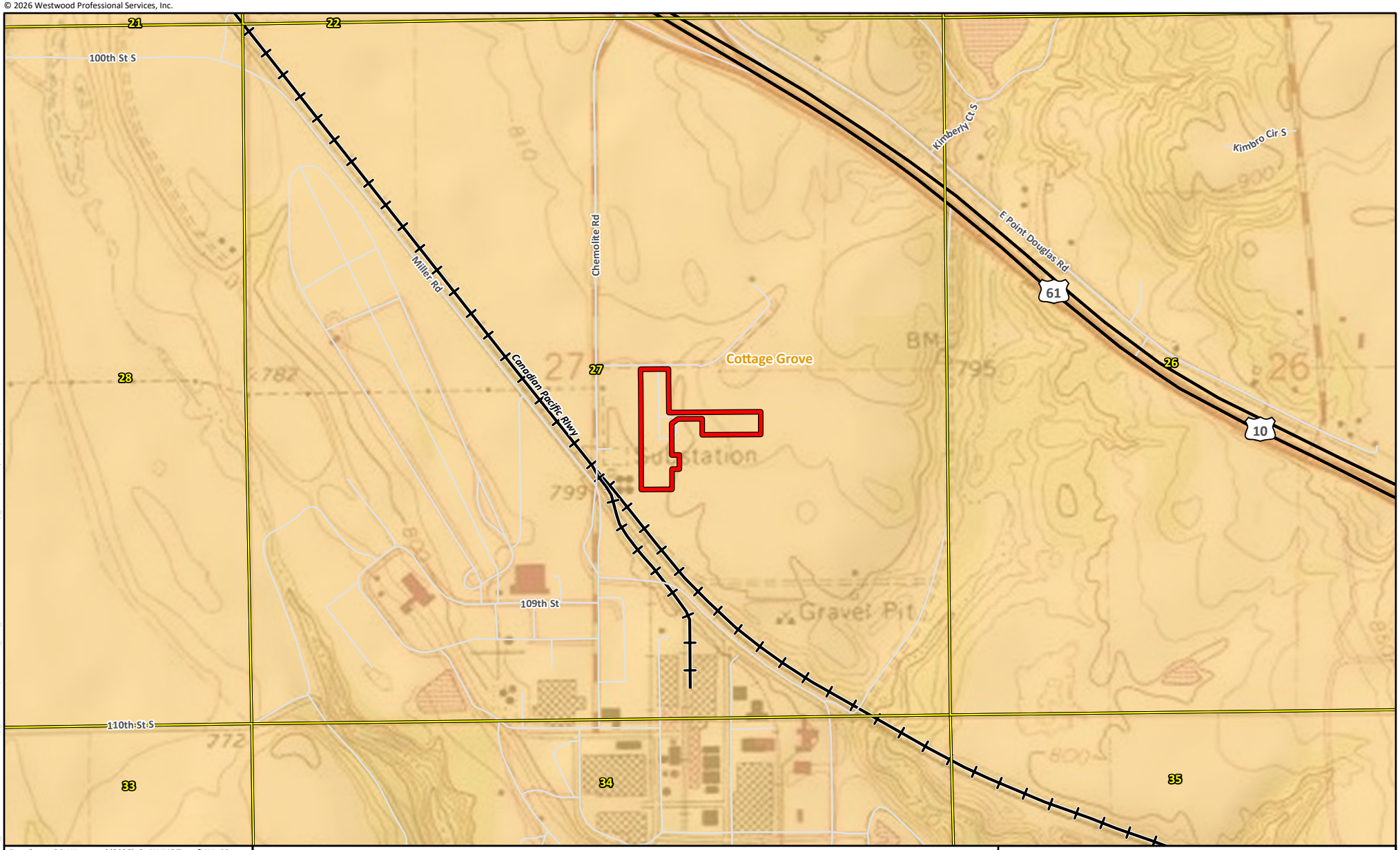
U.S Department of Agriculture (USDA) Farm Service Agency (FSA). 2022. Conservation Reserve Program Fact Sheet. Available at: https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdafiles/FactSheets/2022/conservation-reserve_program-fact_sheet_2022.pdf

U.S Department of Agriculture (USDA) Farm Service Agency (FSA) Minnesota State Office. Conservation Reserve Program (CRP), Wetland Reserve Program (WRP), and Conservation Reserve Enhancement Program (CREP) data. 2007.

U.S. Fish and Wildlife Service (USFWS). 2024. National Wetland Inventory Wetland Mapper. Available at: https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper

Exhibits

Cottage Grove BESS Project
City of Cottage Grove, Washington County, MN



Data Source(s): Westwood (2026); Esri WMS Topo & World Streets Basemaps (Accessed 2026); U.S. Census Bureau (2024, 2025); PLSS (2024).

N

0 1,000 Feet

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Cottage Grove BESS Project

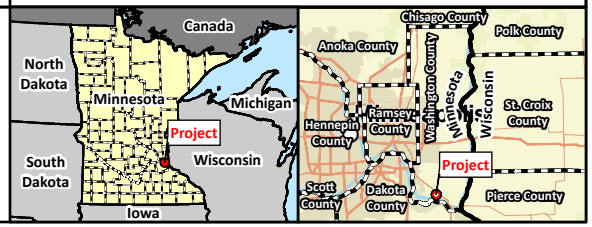
City of Cottage Grove, Washington County, Minnesota

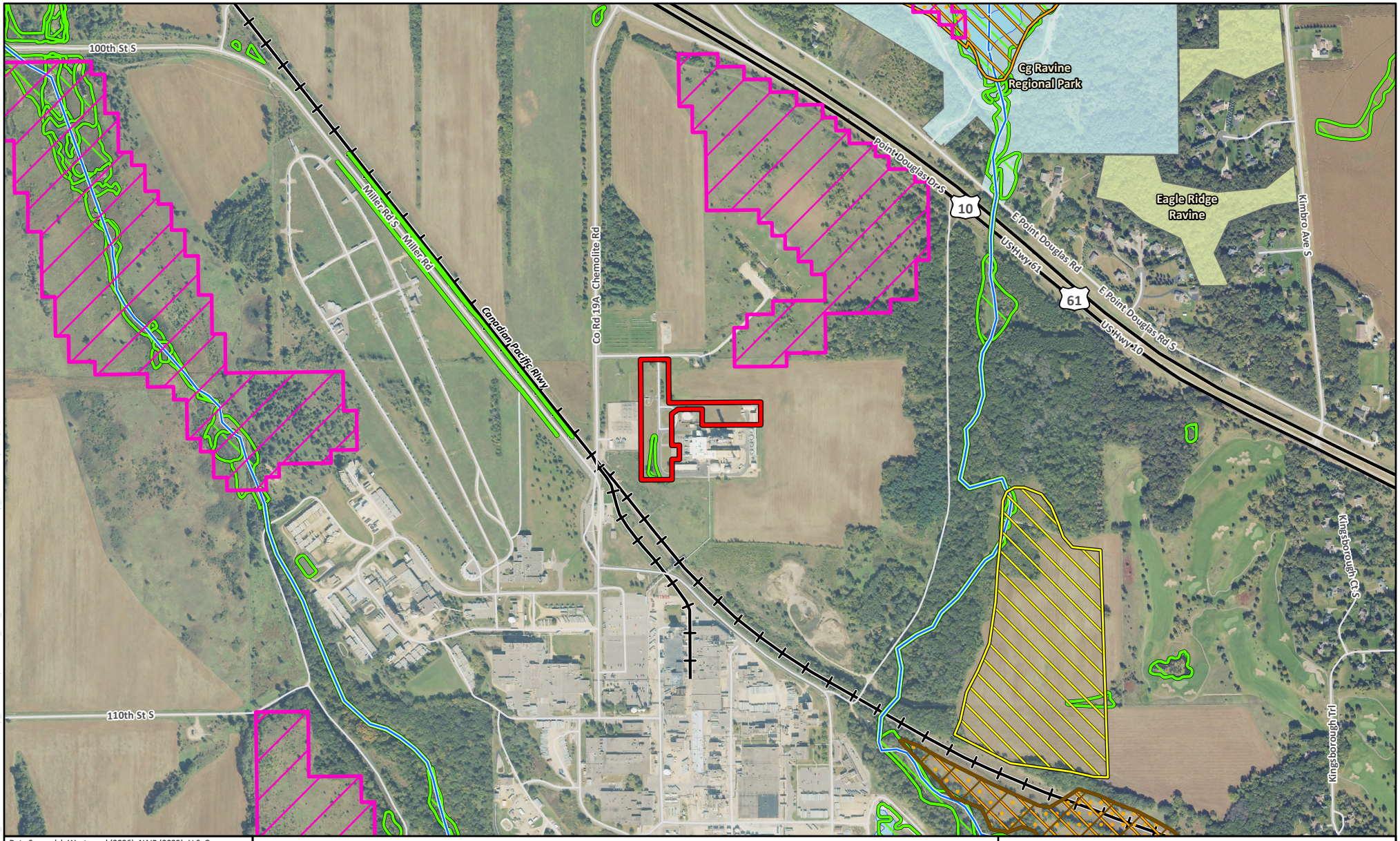
Project Location & USGS Topography

Exhibit 1

Legend

- Project Area
- County Boundary
- PLSS Township Boundary
- PLSS Section Boundary
- Municipal Boundary
- Railroad
- Major Road
- Road





Data Source(s): Westwood (2026); NAIP (2025); U.S. Census Bureau (2024, 2025); PADUS (2025); MNDNR (2024); NWI (2025); NHD (2024, 2025).

N

0 1,000 Feet

Cottage Grove BESS Project

City of Cottage Grove, Washington County, Minnesota

Natural Resource Mapping

Exhibit 2

Legend

- Project Area
- MNDNR Native Prairie
- Native Plant Community
- MNDNR RSEA
- NWI Wetlands
- NHD Waterbody
- NHD Flowline
- Railroad
- Major Road
- Road

MBS Sites of Biodiversity Significance

- Moderate
- Below

PADUS Designation

- Local Conservation Area
- Local Park

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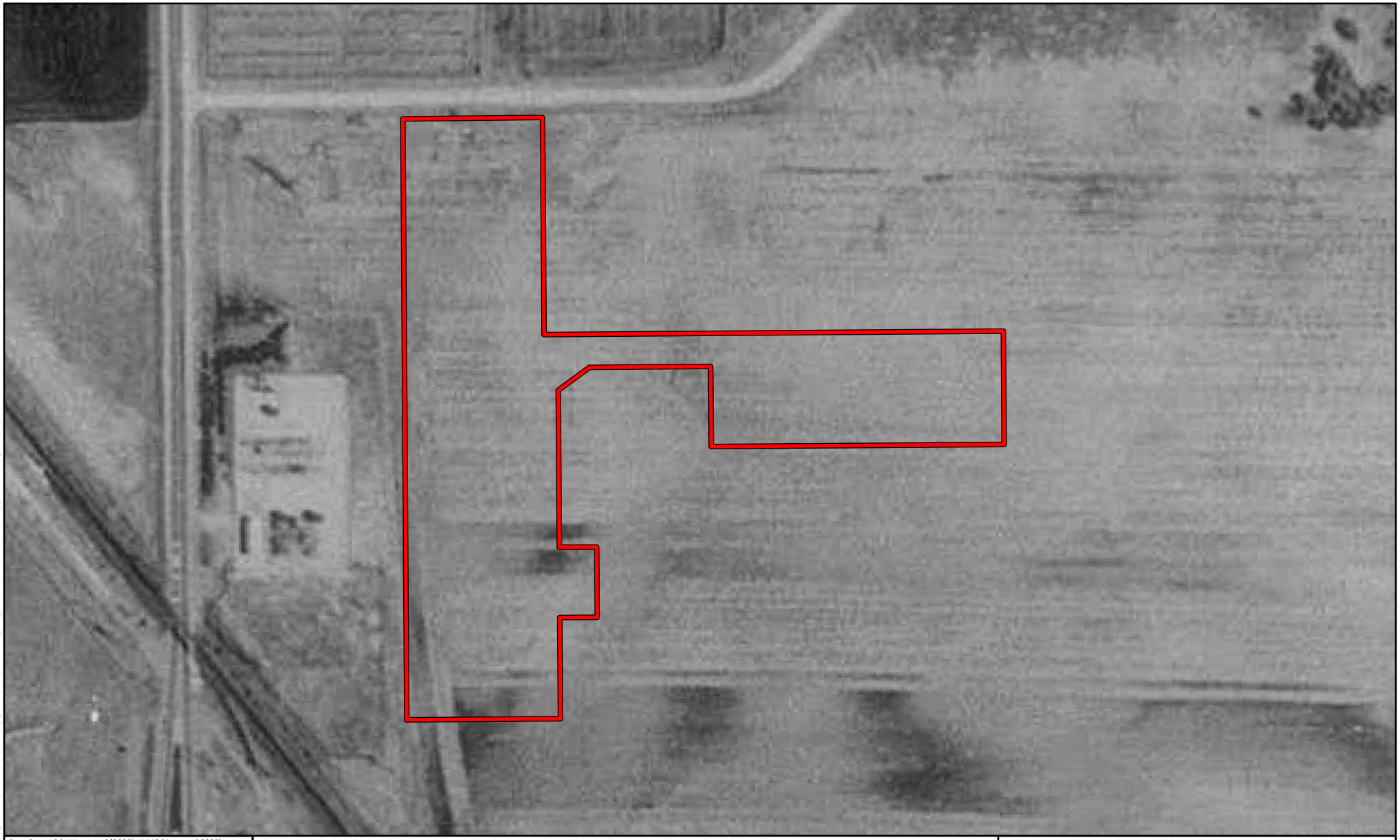

Data Source(s): Westwood (2026); WMS (Accessed 2025).

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0 200 Feet

Cottage Grove BESS Project

City of Cottage Grove, Washington County, Minnesota

1991 Historic Aerial Image

Exhibit 3

Legend

Project Area

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