

# **Appendix K**

## Native Prairie Assessment

POTENTIAL NATIVE PRAIRIE DESKTOP ASSESSMENT

# Midwater Energy Storage Project

Shell Rock Township, Freeborn County,  
Minnesota

SEPTEMBER 25, 2024

PREPARED FOR:

**spearmint**

PREPARED BY:

**Westwood**

# Potential Native Prairie Desktop Assessment

Midwater Energy Storage Project

Shell Rock Township, Freeborn County, Minnesota

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# 1. Introduction

This report presents the results of the desktop assessment conducted to identify areas of Potential Native Prairie (PNP) within the Project Area for the Midwater Energy Storage Project (Project), which covers 104.48 acres (Project Area) of agricultural, grazing, and lightly wooded land located in Township 101 North, Range 20 West, Sections 7, 8 and 17 in Shellrock Township, Freeborn County, Minnesota (**Exhibit 1**). The Primary Development Area is the anticipated Project footprint which is generally limited to the agricultural areas in the southern half of the Project Area (**Exhibit 1**). Westwood Professional Services, Inc. (Westwood) performed this work on behalf of Midwater BESS, LLC in May 2024.

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

## 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:** 1938 and 1951
- **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 potential 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.

PNPs that were not removed from consideration based on desktop evidence were photographed in the field to document their existing conditions (**Appendix A**). Some PNPs were observed via pedestrian and roadside surveys as part of a field wetland delineation conducted by Westwood biologists between April 29 – 30, 2024 and those observations are presented in the results below. Photo documentation was also gathered during cultural resources surveys conducted from June 6 to 12, 2024.

Data collected from the April 2024 and June 2024 field visits included notes on dominant species and representative photographs. Field survey results include land cover type and dominant vegetation that support the “no” native prairie determinations. Road rights-of-way were not included for consideration.

### 3. Desktop Assessment Results

Of the GIS data layers examined, historical imagery is the only indication of PNPs present within the Project Area. NPC and railroad ROW prairies GIS data layers indicated native prairies located south of the Project (**Exhibit 2, “Natural Resource Mapping”**). Based on aerial imagery, four PNP areas were initially identified within the Project Area; PNPs 1, 2, 3 and 4 (**Exhibit 3**).

Historical aerial photography back to 1991 showed consistent agricultural use in open, non-wetland portions of the Project Area, but it is unclear if that included row crop tillage historically or if was limited to hay production and/or grazing during these years. Historic imagery from 1951 and 1938 show the clearest evidence of tillage (**Exhibits 4 and 5**, UMN, 2015). Around 2010 disturbance associated with the construction of the substation, utility line and access roads is apparent west of PNP 3 and south of PNP 4.

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

- **MBS Sites of Biodiversity Significance (SBS):** No prairie SBSs were identified in the Project Area. Two were identified less than 0.1 miles south of the Project.
- **NPC:** No NPCs are present in the Project Area. One is located 0.45 miles south of the Project Area along U.S. Highway 65.
- **RSEA:** No prairie RSEAs are present in the Project Area. One RSEA site is located south of the Project Area along U.S. Highway 65 and generally corresponds to the MBS SBS.
- **Railroad ROW Prairies:** No railroad ROW prairies are present in the Project Area. One is located 0.45 miles south of the Project Area along U.S. Highway 65 and corresponds to the NPC.
- **MNDNR Potentially Undisturbed Land:** No virgin sod is mapped in or adjacent to the Project Area.
- **CRP lands:** CRP land is mapped in the Project Area along the north, west, and south portions of the Project Area, overlaps most of the agricultural portions of the property and encompasses all of PNPs 1, 2, 3 and 4 (USDA-FSA, 2007) (**Exhibits 2 and 3**). Approximately 53.4 acres of CRP land is located within the Project Area. According to the CRP data, the CRP land is made up of four different contracts that expired between September 2009 and September 2020.

Assuming the former CRP lands qualified as eligible cropland at the time (planted to an agricultural commodity for four of six crop years), these areas would likely be removed from consideration as potential native prairie as this provides evidence of historic tillage by qualifying for CRP. The landowner provided some documentation of past CRP contracts, but the record did not provide sufficient information on the contract terms to confirm it's eligibility was as cropland. However, communications with the landowner indicated these areas were formerly in corn and soybean row crop agriculture.

- **NWI:** Several wetlands are located in the Project Area. Listed wetlands according to NWI data are freshwater emergent, freshwater forested/shrub, freshwater pond, and riverine. These wetland types are generally not associated with prairies thus making it unlikely potential prairies would be present.

## 4. Field Survey Results

Observations within some of the PNPs occurred as part of the field wetland delineation conducted by Westwood biologists on April 29, 2024 and are summarized in **Table 1**. Photographs were also taken of PNPs from June 8 to 12, 2024. Where surveyed, field observations generally found PNPs dominated by non-native cool season pasture grasses such as smooth brome (*Bromus inermis*), and Kentucky bluegrass (*Poa pratensis*). However, it is recognized that the presence of native species cannot be ruled out entirely because biologists' observations on April 29, 2024 occurred early in the growing season when many species had not yet emerged. PNP 04 was not visited by Westwood biologists but displayed similar characteristics of the other PNPs in both land use and generally

observed vegetation based on photographs of those areas.

A photograph documenting the typical condition of PNPs at the time of the April visit is included in **Appendix A** as well as photographs of each PNP from the June 2024 visit. June photographs confirm that all four PNPs are generally dominated by a combination of smooth brome and Kentucky bluegrass.

**Table 1. Summary Desktop Assessment and Field Survey Results of Potential Native Prairie Areas**

Site	Native Prairie	Mapping	Desktop Observations Supporting Potential Native Prairie	Survey Type	Field Survey Results
PNP 01	Not likely	CRP Land	Possible untilled land in aerial imagery to 1991; tilled in 1938 and 1951. May be excluded as former CRP-qualifying cropland.	Pedestrian/Photo log	Hayfield dominated by smooth brome and Kentucky bluegrass.
PNP 02	Not likely	CRP Land	Possible untilled land in aerial imagery to 1991; tilled in 1938 and 1951. May be excluded as former CRP-qualifying cropland.	Pedestrian/Photo log	Small hayfield dominated by smooth brome and Kentucky bluegrass.
PNP 03	Not likely	CRP Land	Possible untilled land in aerial imagery to 1991; tilled in 1938 and 1951. May be excluded as former CRP-qualifying cropland.	Photo log	Small hayfield similar to PNP 1 & 2.
PNP 04	Not likely	CRP Land	Possible untilled land in aerial imagery to 1991; tilled in 1938 and 1951. May be excluded as former CRP-qualifying cropland.	Photo log	Small hayfield similar to PNP 1 & 2.

## 5. Conclusion

A total of four PNPs were identified from the desktop evaluation. Based on available information, it is likely PNPs 1 through 4 were likely tilled cropland as evidenced by their historic enrollment as CRP land and early aerial imagery. The landowner has confirmed historic row crop agriculture in these areas and photographs confirm that PNPs 1 through 4 are dominated by smooth brome and Kentucky bluegrass and are unlikely to support native prairie.

## 6. References

- Google Earth Pro. 2024. Desktop Application. Version 7.3. Available at: <https://www.google.com/earth/about/versions/>
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- MNDNR. 2017. MCBS Railroad Rights-of-Way Prairies GIS Layer. Updated 2023. Available at: <https://gisdata.mn.gov/dataset/biota-mcbs-railroad-prairies>
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- 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](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**











Midwater Energy Storage Project  
Shell Rock Township, Freeborn County, MN

**Midwater Energy Storage Project**  
Shellrock Township, Freeborn County, Minnesota

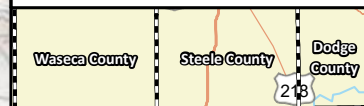
**Project Location &  
USGS Topography**

**Exhibit 1**

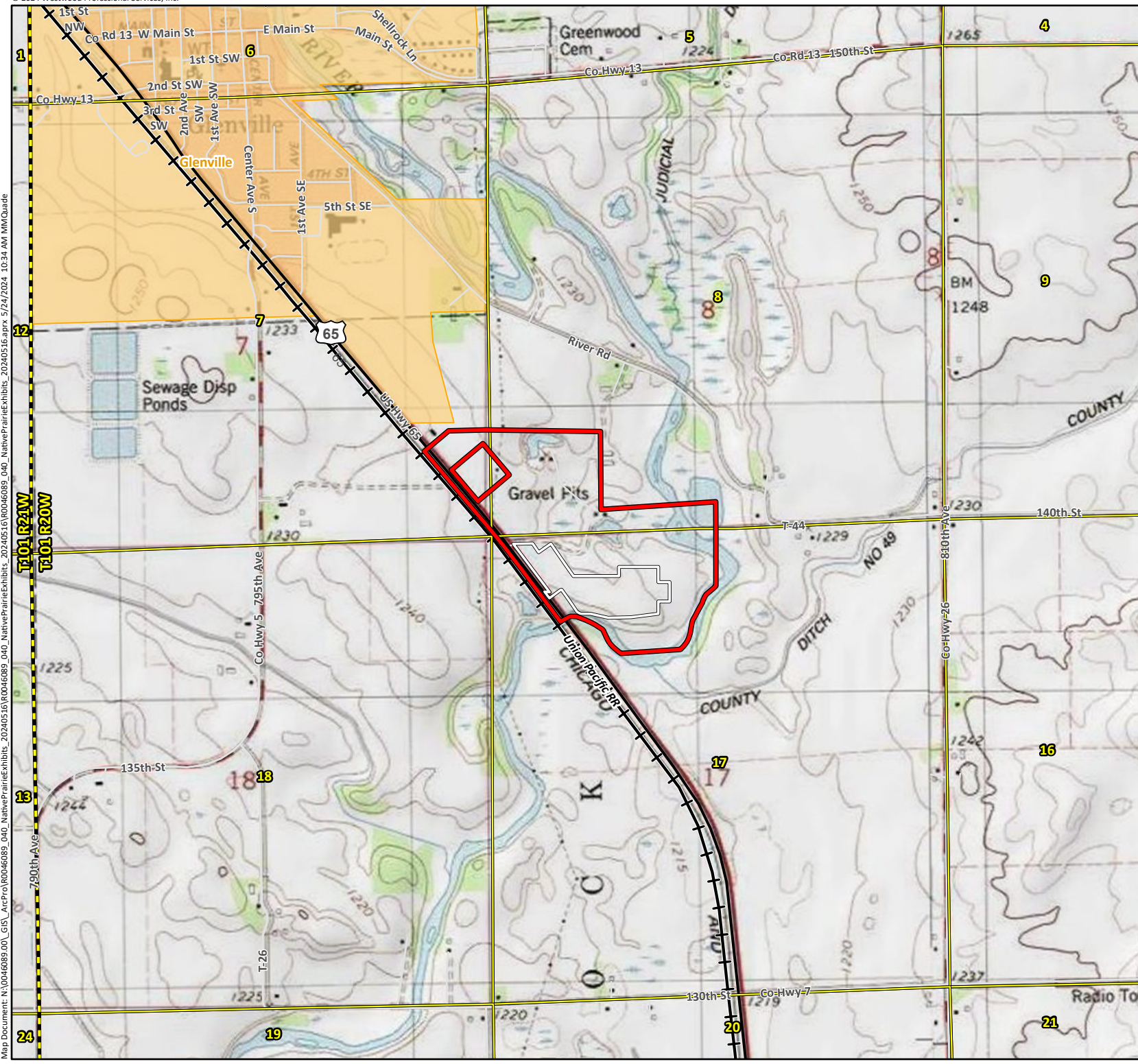
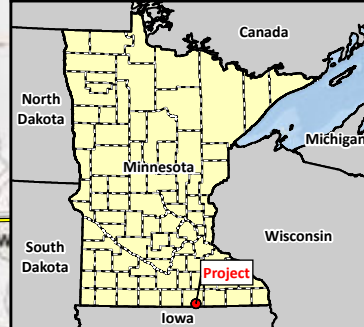
**Legend**

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

Data Source(s): Westwood (2024); ESRI WMS USA Topo & World Streets Basemaps (Accessed 2024); PLSS (2022); U.S. Census Bureau (2021 & 2023).



Iowa



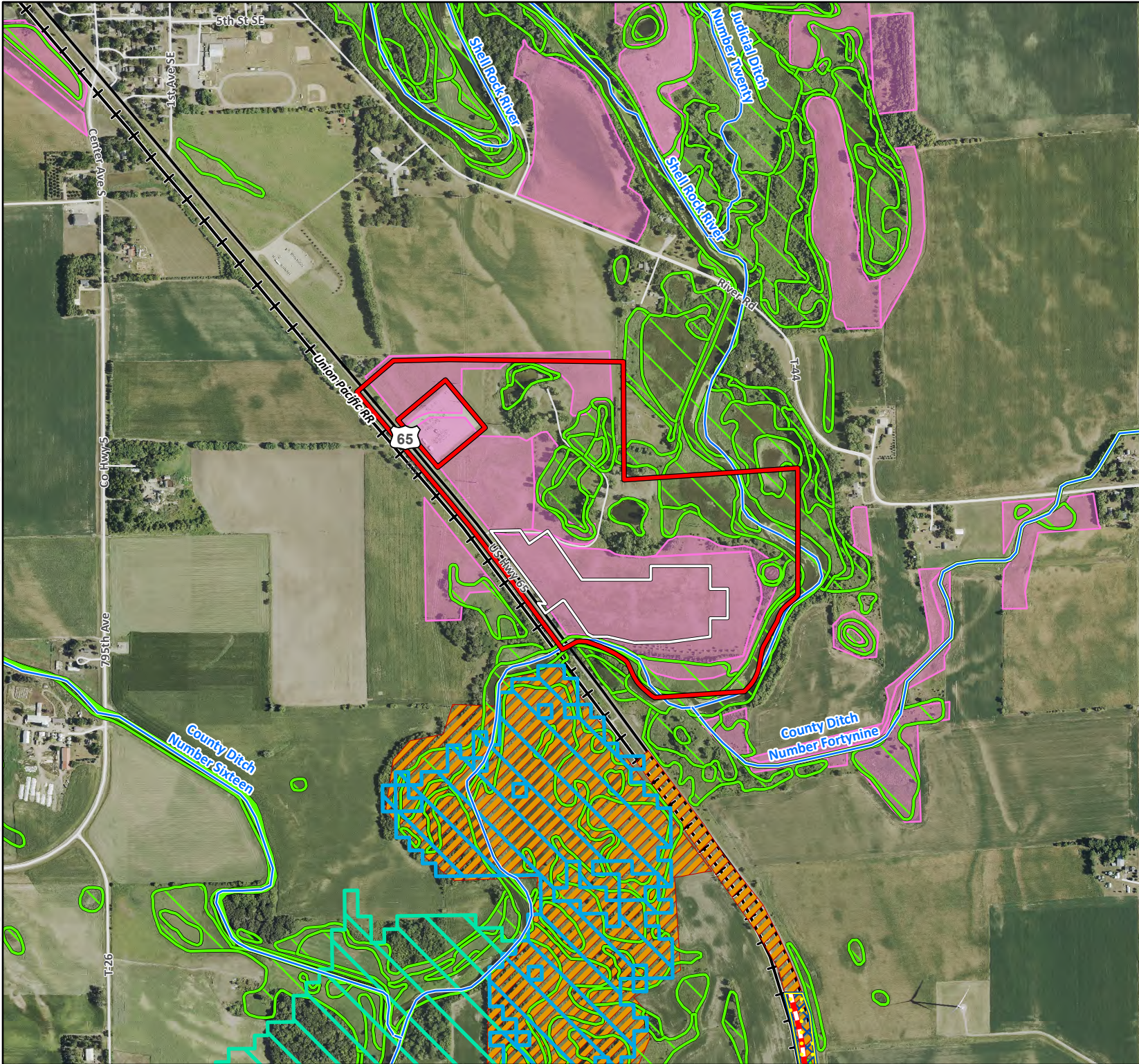
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### Midwater Energy Storage Project




Shellrock Township, Freeborn County, Minnesota

### Natural Resource Mapping

### Exhibit 2



#### Legend

-  Project Area
-  Primary Development Area
-  Conservation Reserve Program (CRP) Land
-  MNDNR Native Plant Communities (NPC)
-  MNDNR Native Prairies
-  MNDNR Regionally Significant Ecological Area (RSEA)
-  MNDNR Regionally Significant Ecological Corridors
-  MNDNR MBS Sites of Biodiversity Significance
-  NWI Wetland
-  NHD Flowline
-  MNDNR Railroad Right-of-Way Prairie
-  Major Road
-  Road
-  Railroad

Data Source(s): Westwood (2024); NAIP (2023); CRP (2007); MN DNR (2024); MCBS (2021); NWI (2023); U.S. Census Bureau (2021 & 2023); NHD (2023).
















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Shellrock Township, Freeborn County, Minnesota

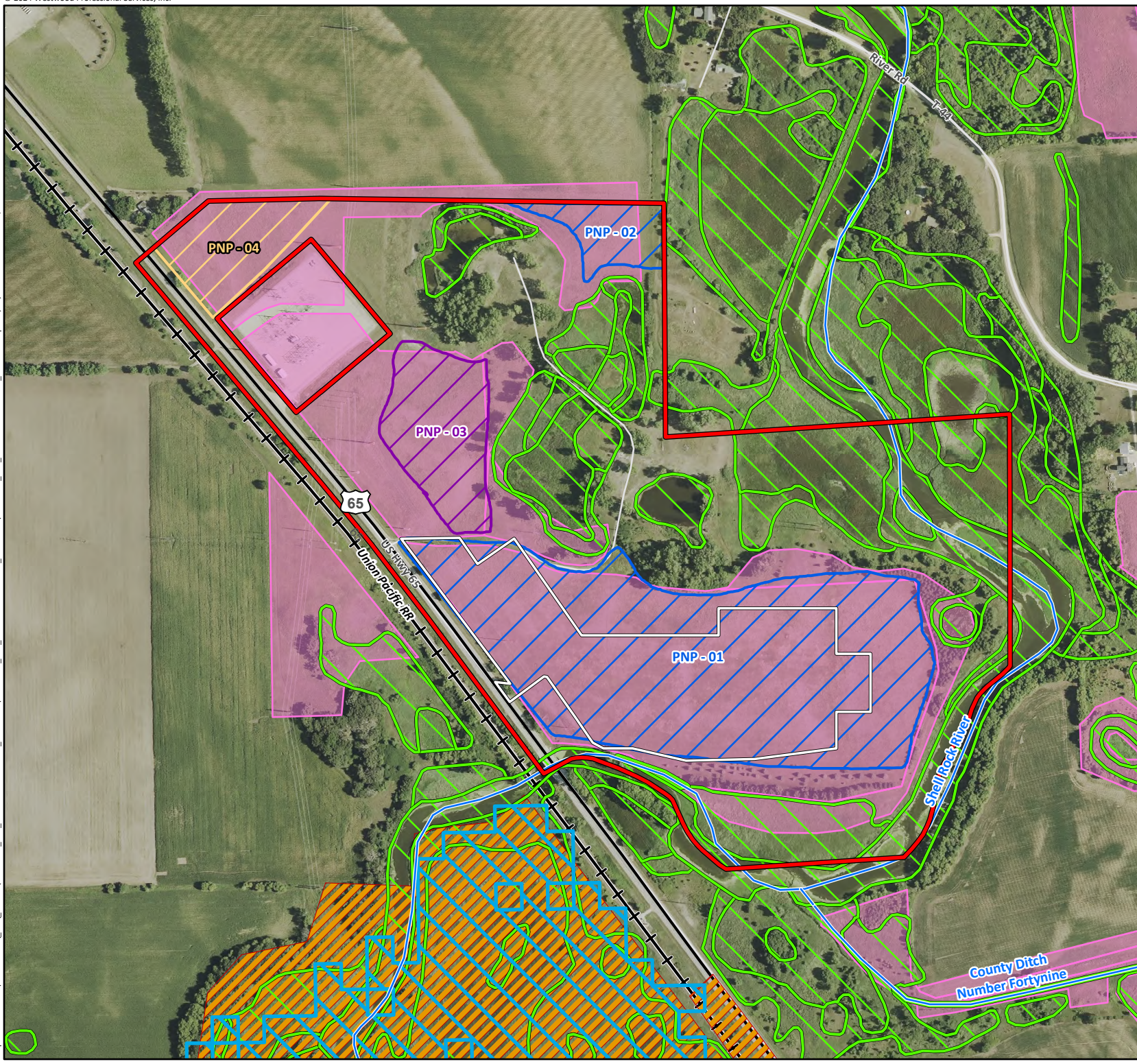
**Potential Native  
Prairie Areas**

**Exhibit 3**

**Legend**

-  Project Area
  -  Primary Development Area
  -  Conservation Reserve Program (CRP) Land
  -  MNDNR Regionally Significant Ecological Area (RSEA)
  -  MNDNR MBS Sites of Biodiversity Significance
  -  NWI Wetland
  -  NHD Flowline
  -  Major Road
  -  Road
  -  Railroad
- Potential Native Prairies**
-  Field Surveyed - Pedestrian
  -  Roadside Survey
  -  Not Field Surveyed

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








**Midwater Energy Storage Project**  
Shellrock Township, Freeborn County, Minnesota

1938 Historic Imagery

Exhibit 4

**Legend**

-  Project Area
-  Primary Development Area
-  Conservation Reserve Program (CRP) Land
-  Major Road
-  Road
-  Railroad
- Potential Native Prairies**
-  Field Surveyed - Pedestrian
-  Roadside Survey
-  Not Field Surveyed



Data Source(s): Westwood (2024); MHAPO (Accessed 2024); USDA FSA CRP (2007); U.S. Census Bureau (2021 & 2023).












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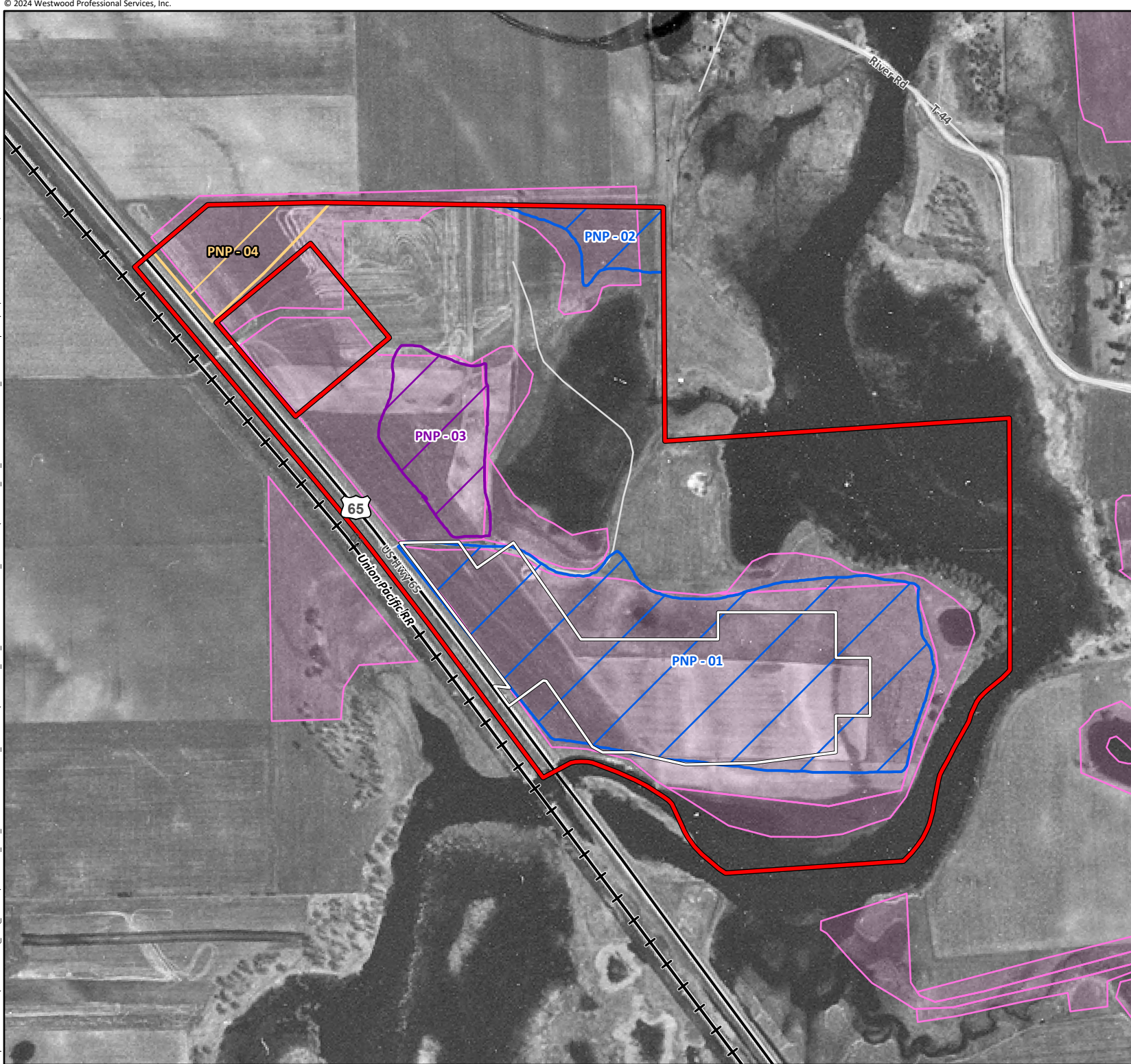
**Midwater Energy Storage Project**  
Shellrock Township, Freeborn County, Minnesota

1951 Historic Imagery

Exhibit 5

**Legend**

-  Project Area
-  Primary Development Area
-  Conservation Reserve Program (CRP) Land
-  Major Road
-  Road
-  Railroad
- Potential Native Prairies**
-  Field Surveyed - Pedestrian
-  Roadside Survey
-  Not Field Surveyed



Data Source(s): Westwood (2024); MHAPO (Accessed 2024); USDA FSA CRP (2007); U.S. Census Bureau (2021 & 2023).

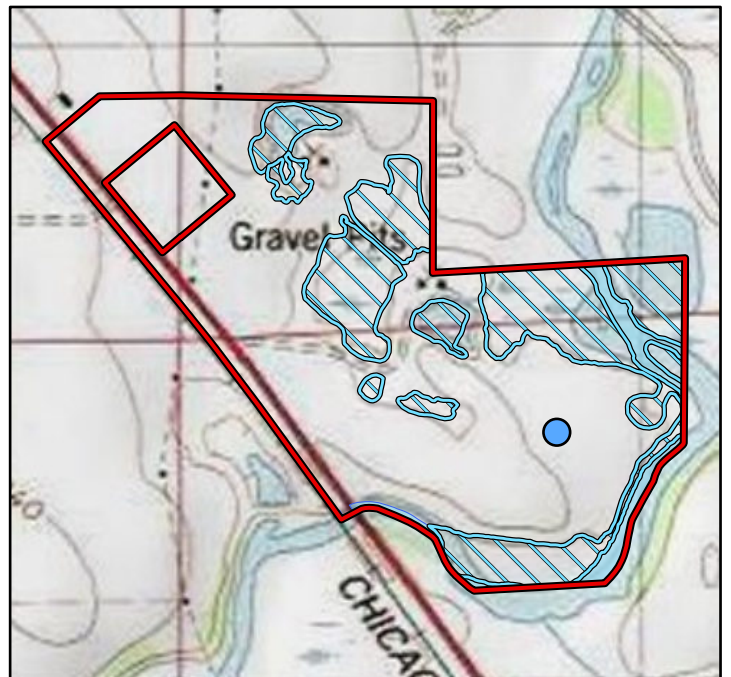
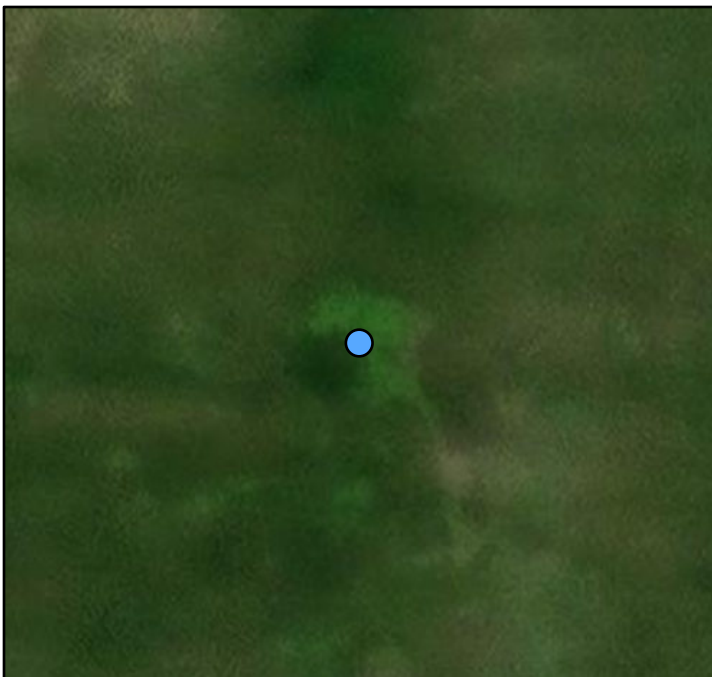


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# **Appendix A**

## **Photo Log**

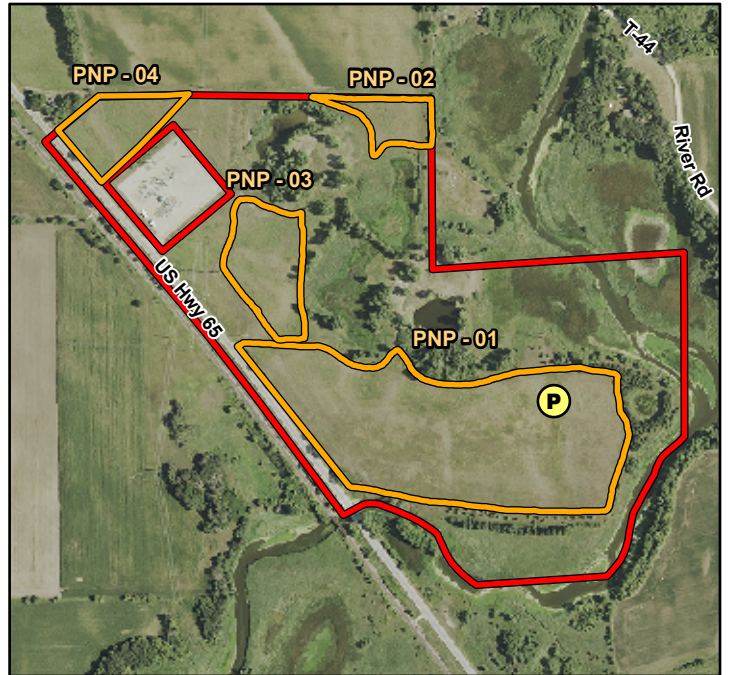
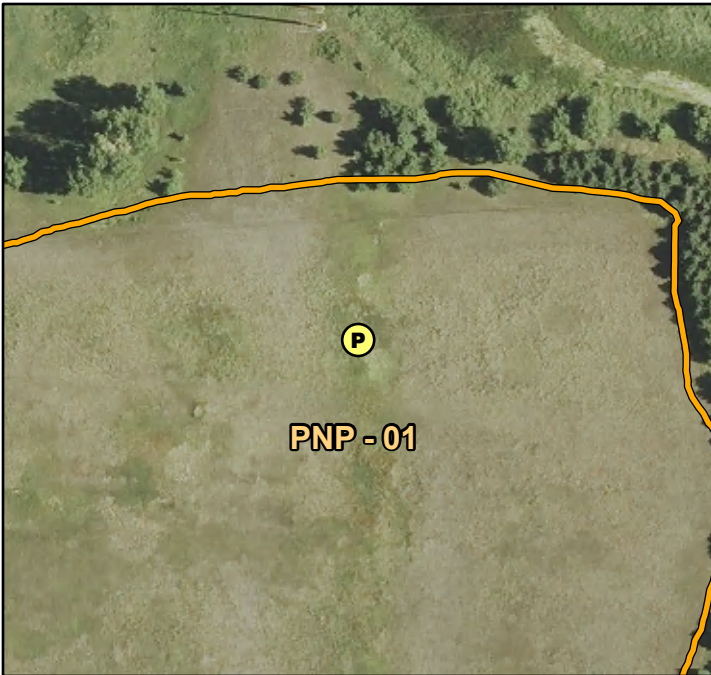
# Midwater BESS Project Delineation Site Photograph





# Midwater BESS Potential Native Prairie Assessment Photolog

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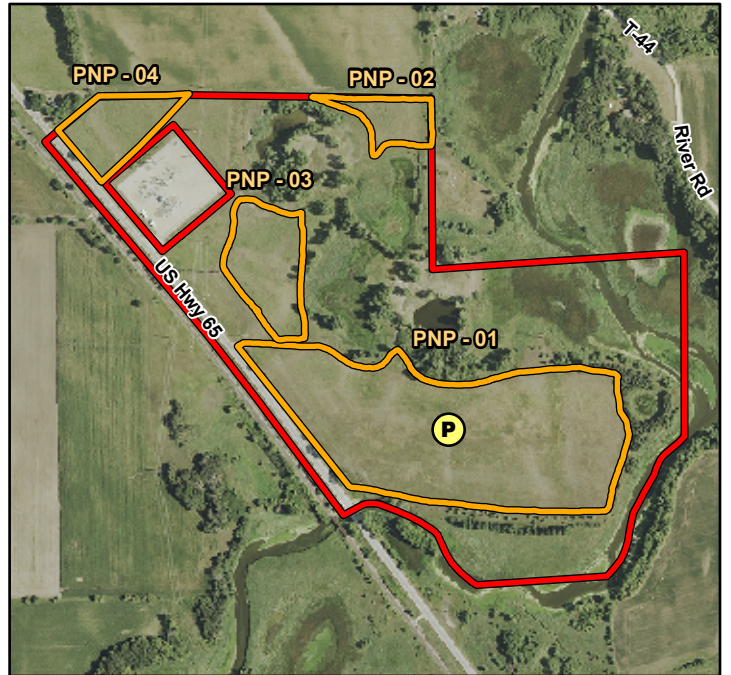
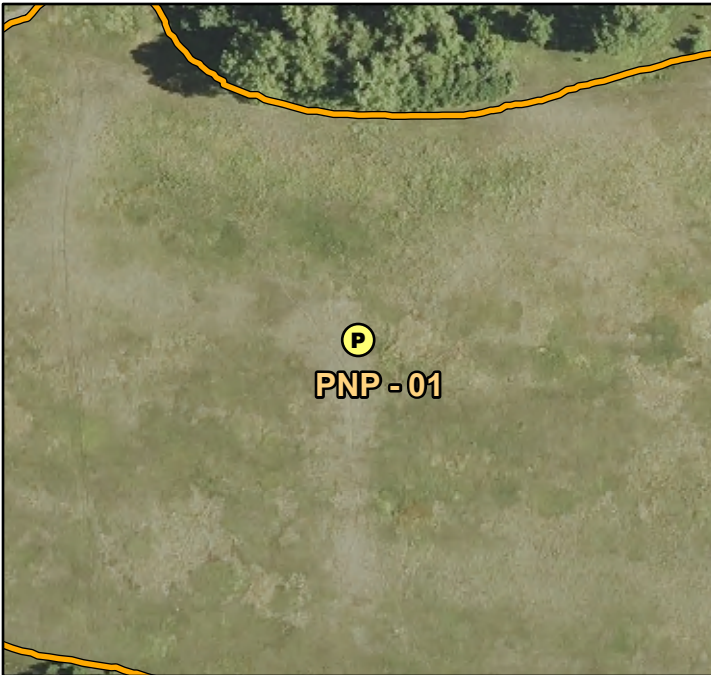
- P Photo Location
- Potential Native Prairie
- Project Area

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Photo ID - PL-25



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Potential Native Prairie	PNP - 01

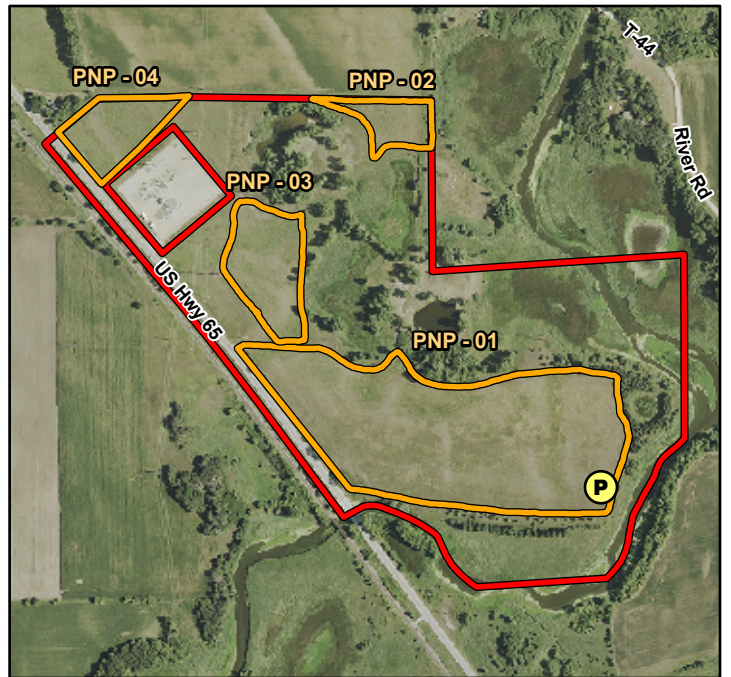
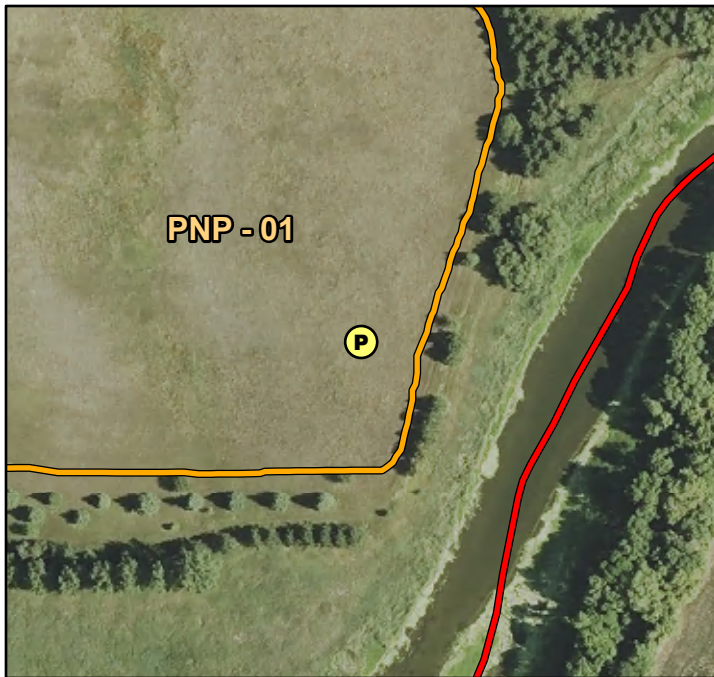
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- P Photo Location
- Potential Native Prairie
- Project Area

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Photo ID - PL-28



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### Legend

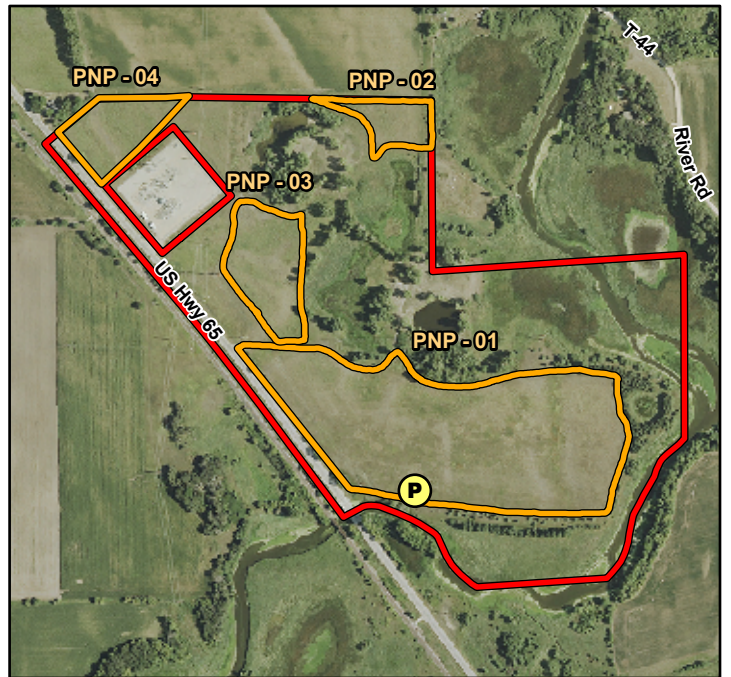
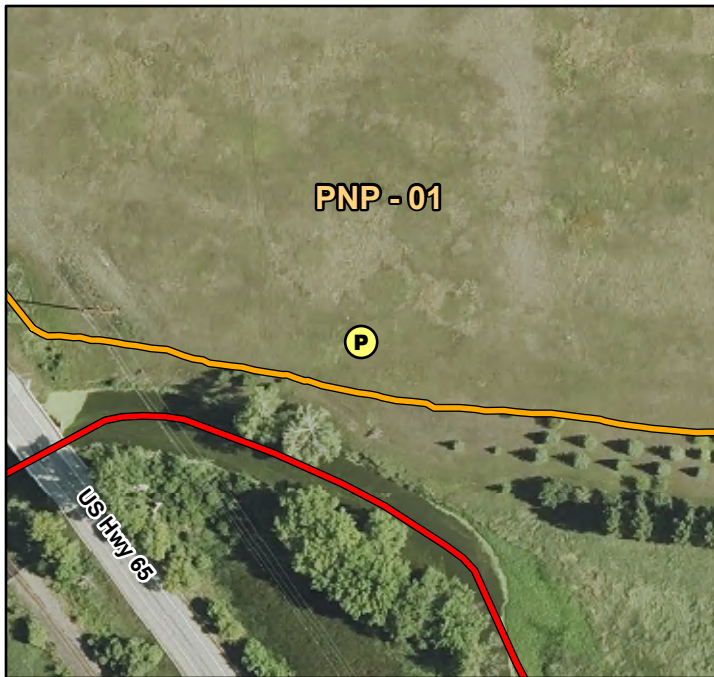
- P Photo Location
- Potential Native Prairie
- Project Area

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# Midwater BESS Potential Native Prairie Assessment Photolog

Photo ID - PL-32



### Attributes

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Photo Direction	N
Potential Native Prairie	PNP - 01

### Legend

- Photo Location
- Potential Native Prairie
- Project Area

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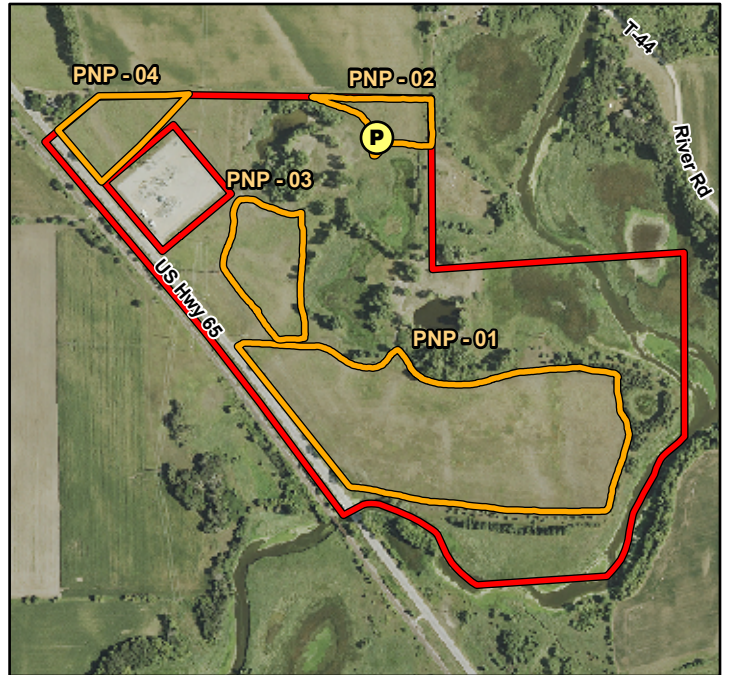
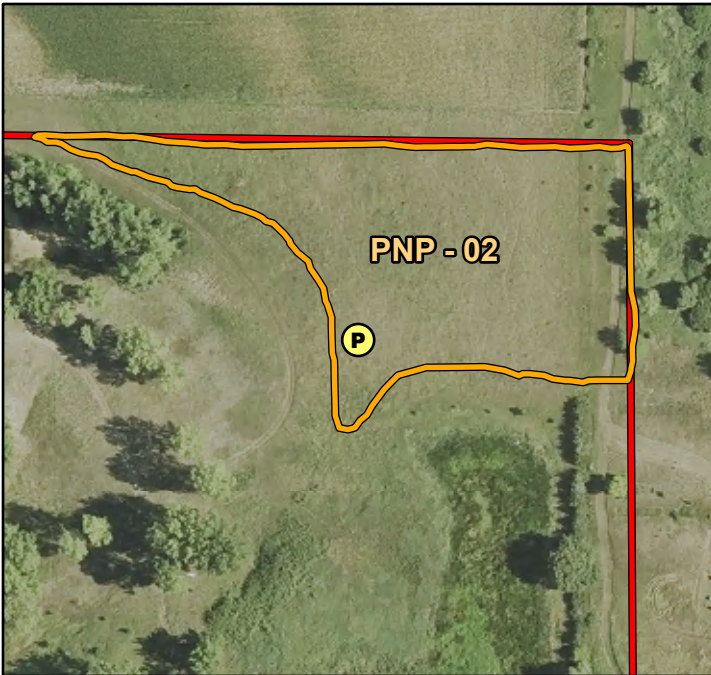






# Midwater BESS Potential Native Prairie Assessment Photolog

Photo ID - PL-49



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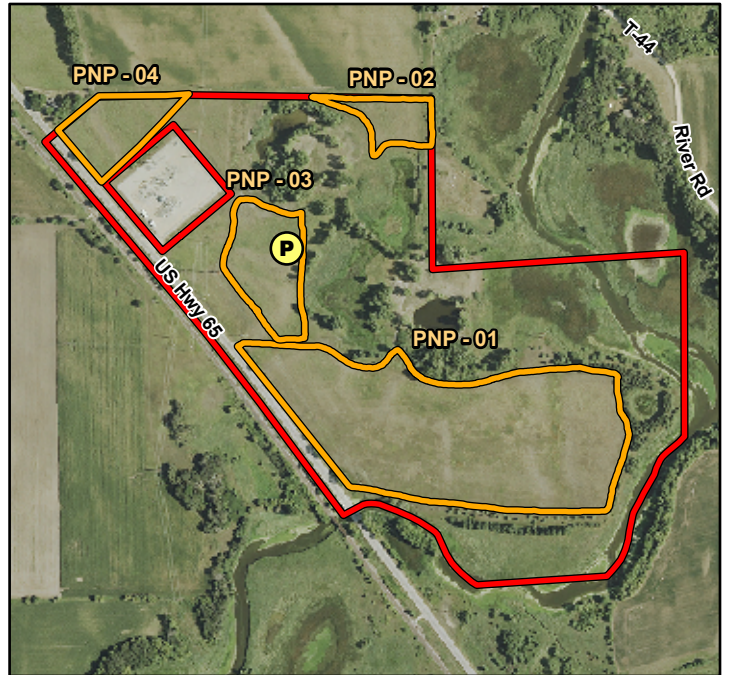
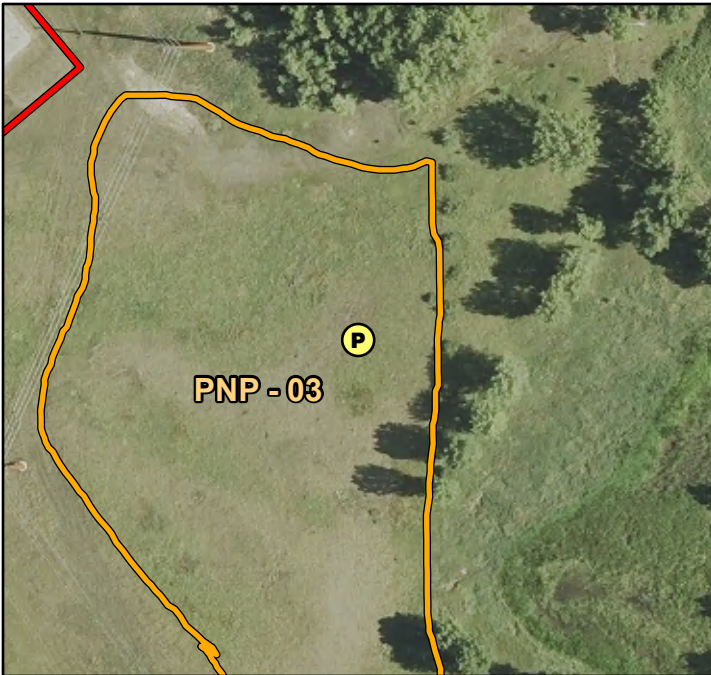
**Legend**

- P Photo Location
- Potential Native Prairie
- Project Area

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# Midwater BESS Potential Native Prairie Assessment Photolog

Photo ID - PL-21



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Photo Direction	NW
Potential Native Prairie	PNP - 03

**Legend**

- P Photo Location
- Potential Native Prairie
- Project Area

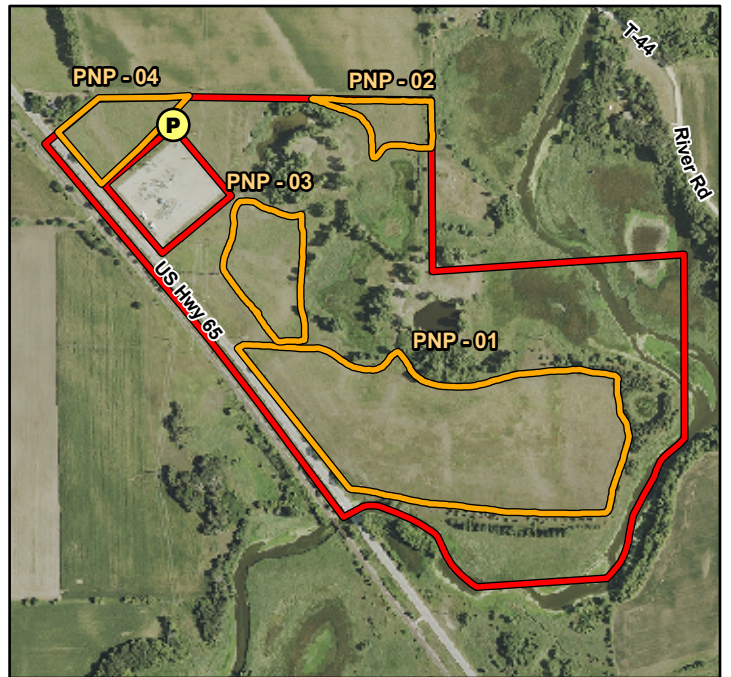
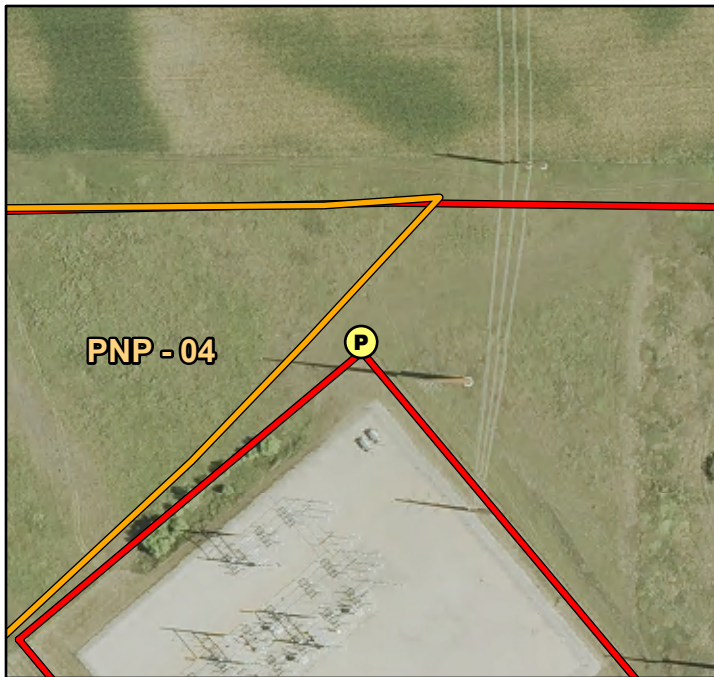
Map Document: N:\0046089.001\_GIS\_ArcPro\046089\_040\_NativePrairieAssessmentPhotologs\_20240618\040\_NativePrairieAssessmentPhotologs\_20240618.aprx 6/21/2024 10:51 AM TradeView





# Midwater BESS Potential Native Prairie Assessment Photolog

Photo ID - PL-14



Attributes	
Photo ID	PL-14
Photo Direction	SW
Potential Native Prairie	PNP - 04

**Legend**

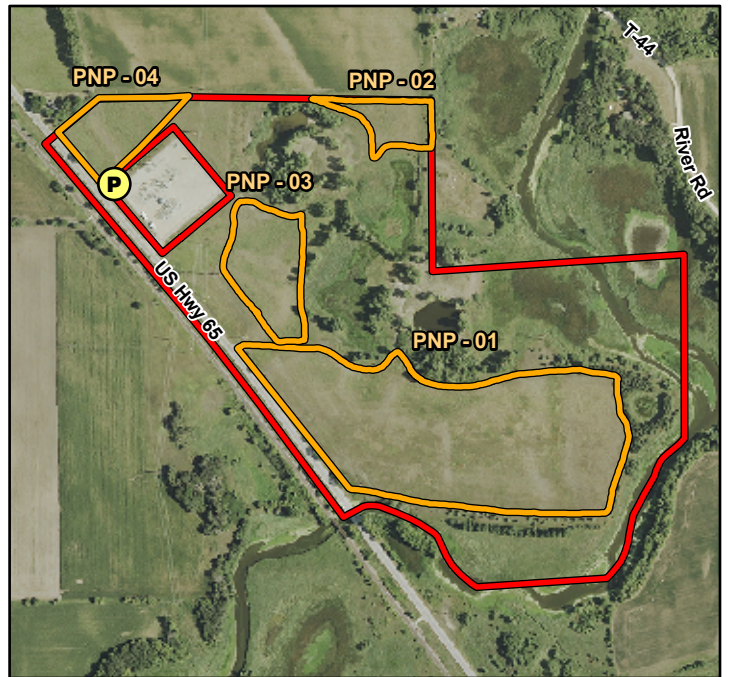
- P Photo Location
- Potential Native Prairie
- Project Area

Map Document: N:\0046089.001\_GIS\_ArcPro\046089\_040\_NativePrairieAssessmentPhotologs\_20240618\040\_NativePrairieAssessmentPhotologs\_20240618.aprx 6/21/2024 10:52 AM TradeVib



# Midwater BESS Potential Native Prairie Assessment Photolog

Photo ID - PL-39



Attributes	
Photo ID	PL-39
Photo Direction	N
Potential Native Prairie	PNP - 04

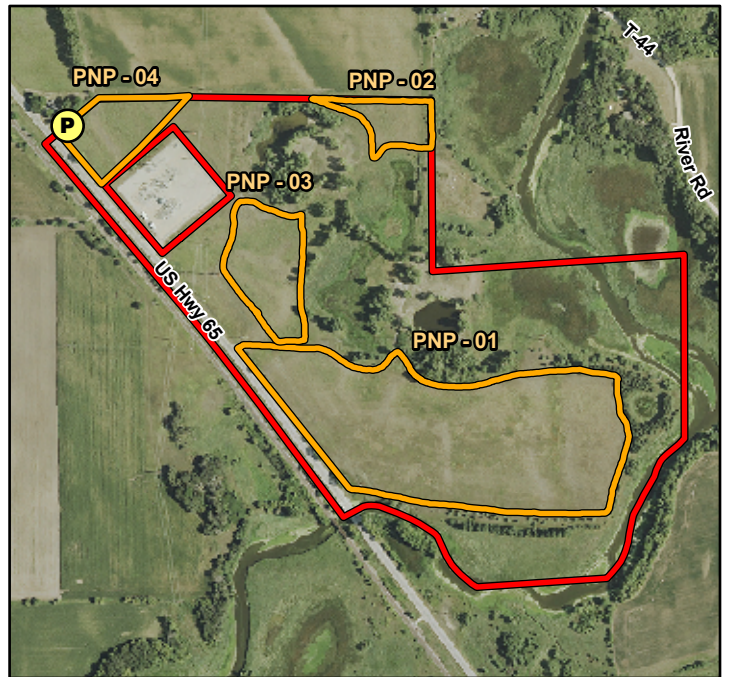
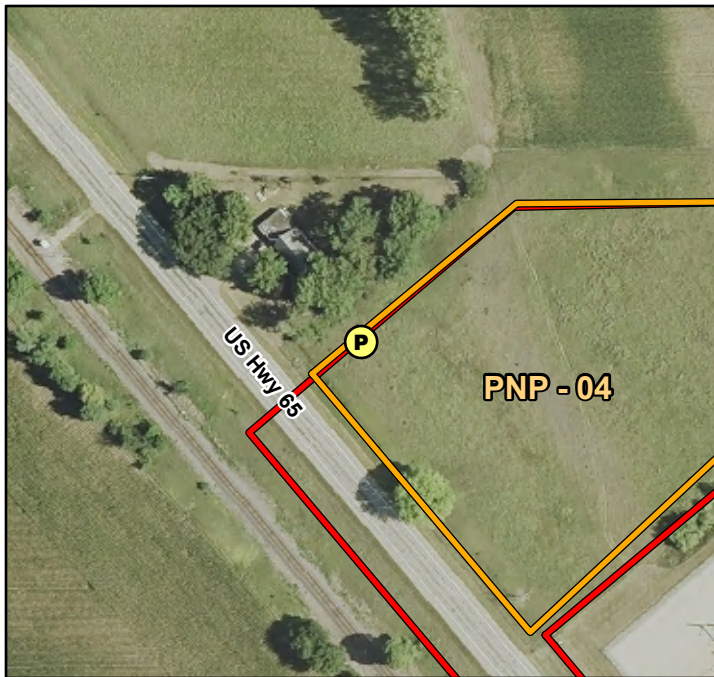
**Legend**

- P Photo Location
- Potential Native Prairie
- Project Area

Map Document: N:\0046089.001\_GIS\_ArcPro\046089\_040\_NativePrairieAssessmentPhotologs\_20240618\0046089\_040\_NativePrairieAssessmentPhotologs\_20240618.aprx 6/21/2024 10:52 AM rdevitb

# Midwater BESS Potential Native Prairie Assessment Photolog

Photo ID - PL-53



### Attributes

Photo ID	PL-53
Photo Direction	W
Potential Native Prairie	PNP - 04

### Legend

- P Photo Location
- Potential Native Prairie
- Project Area

Map Document: N:\0046089.001\_GIS\_ArcFrotoR0046089\_040\_NativePrairieAssessmentPhotologs\_20240618.aprx 6/21/2024 10:52 AM TradeVib