

November 12, 2025

Ms. Sasha Bergman

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

RE: Vegetation Management Plan
North Star Battery Energy Storage Project
PUC Docket No. IP7155/ESS-25-123
CAH Docket No. 5-2500-40938

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 North Star Solar PV LLC (North Star).

In its site permit application for the North Star Battery Energy Storage project, the applicant states that “North Star Storage will follow the revegetation guidelines outlined in the Solar Facility’s Vegetation Management Plan that was filed with eDockets in April 2016.”¹ The VMPWG has reviewed the updated VMP provided for the North Star Solar Project as a compliance filing on April 13, 2016, following the permitting of the North Star Solar project and order by the Commission in 2016.² 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 North Star 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 and includes potential seed mixes that can be beneficial for the site. However, there are recommended modifications

¹ North Star Energy Storage, LLC, Site Permit Application to the Minnesota Public Utilities Commission for the North Star Battery Energy Storage System Project. February 28, 2025, edocket no. [20252-215915-02](#).

² North Star Solar PV LLC, Site Permit Condition 5.2 – REVISED Vegetation Management Plan. April 13, 2016, eDocket No. [20164-120014-03](#).

that should be made to ensure the applicant meets the proposed site permit condition³ of a vegetation management plan that includes:

- Management objectives addressing short term (year 0-5, seeding and establishment) and long term (year 5 through the life of the Project) goals;
- A description of planned restoration and vegetation management activities, including how the site will be prepared, timing of activities, how seeding will occur (e.g., broadcast, drilling, etc.), and the types of seed mixes to be used;
- A description of how the site will be monitored and evaluated to meet management goals;
- A description of the management tools used to maintain vegetation (e.g., mowing, spot spraying, hand removal, fire, grazing, etc.), including the timing and frequency of maintenance activities;
- Identification of the third-party (e.g., consultant, contractor, site manager, etc.) contracted for restoration, monitoring, and long-term vegetation management of the site;
- Identification of on-site noxious weeds and invasive species (native and non-native) and the monitoring and management practices to be utilized; and
- A marked-up copy of the Site Plan showing how the site will be revegetated and that identifies the corresponding seed mixes. Best management practices should be followed concerning seed mixes, seeding rates, and cover crops.

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

Goals and Objectives

- The applicant should define vegetation management objectives that correspond to the existing VMP site permit condition requirements. Clear objectives on how these results will be achieved should be provided for the overall plan. Short-term and long-term management goals and objectives are also necessary for each management unit (array areas, BESS area, etc.).

Management Units

- The impervious to pervious surface ratio is an important factor in vegetation management. The applicant should define and describe both the areas that will be seeded, the Vegetation Management Units (VMUs), and the unseeded area that will contain project components, the Non-Vegetated Management Unit (NVMUs), including the anticipated acreage of impervious surface (gravel, concrete, etc.). The applicant should also describe how the site prep and

³ PUC EIP, North Star BESS Environmental Assessment: Appendix C – Draft Site Permit. Section 5.5: Vegetation Management Plan. October 13, 2025. eDocket no. [202510-223823-01](#).

vegetation removal will occur in each management unit, depending on its planned use. This framing of management units should be maintained throughout the VMP.

Site Preparation

- The VMUs may require different site preparation methods due to characteristics such as soil properties or temporary saturation. The applicant should describe additional site preparation techniques that may be required in specific VMUs or under certain circumstances.
- The applicant is advised to verify the chemical application history of the site to determine if special methods will be necessary to allow for successful native vegetation establishment.

Seed Installation

- 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 indicates that cover crops were originally used in the solar array site and should clarify whether this is planned for the BESS site. The applicant is advised to consult with the VMPWG when integrating cover crops with seed mixes in the BESS site.
- For each VMU, the applicant should include a description of the areas that will be seeded within the BESS site, including methods of installation and anticipated seed mix.

Seed Mixes

- The applicant should clarify if the seed mixes provided in the VMP are consistent with planned use within the BESS site.
- The VMPWG recommends the use of diverse, native perennial seed mixes, which provide maximal wildlife and ecosystem benefits, rather than the state seed mixes proposed. BWSR's [Low Growing Solar Mixes](#) were specifically designed with low-growing native species for solar sites across the state, are suitable for a range of soil conditions, and would satisfy the applicant's preference for low stature vegetation.
- PUC EIP and partner agencies request that the applicant provide a list of species substitutions for each seed mix. The applicant can work directly with PUC EIP, BWSR, and DNR or use the seed substitution list provided by BWSR. The goal is to ensure that the ecological niche and guild of a plant species is retained when substitutions are necessary.

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. Native species should be used for vegetative screening.

Concrete and Gravel Components

- The applicant should include a description of the planned amounts of concrete or gravel to be used within the BESS site. The applicant should address how the increase in impervious surface may influence other factors within the site, such as runoff.
- In the case of gravel use, describe the particle size class and soil classification of the gravel used in the BESS site. The VMPWG recommends the use of locally sourced gravel, as it is more suited to the environment of the project location.

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 should provide information on herbicide type and anticipated herbicide use, including surfactant rate, and frequency. The applicant is advised that widespread application of herbicides may act as a pre-emergent and reduce germination of desired vegetation.
- Controlling invasive woody species such as trees and shrubs may require specific mechanical or chemical techniques. The applicant should include a description of woody vegetation control methods in the VMP.

Monitoring and Reporting

- Monitoring should be conducted by a qualified, third party, independent agency. The selected monitor should have sufficient botanical experience in identifying native plants, native plant communities, invasive species, and non-native species typical of Minnesota. The applicant should develop a monitoring plan that includes both quantitative and qualitative methods.
- 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 should define the 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.

Updates to the Vegetation Management Plan

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

In summary, PUC EIP staff recommend that the applicant continue to coordinate with the VMPWG as it finalizes the vegetation management plan, including the development of diverse, native seed mixes, refinement of the installation, management, and monitoring plans, and a list of species substitutions for

each seed mix. The VMPWG looks forward to the successful site restoration of the North Star Energy Storage Project. 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 North Star Energy Storage Project.

Sincerely,



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PUC EIP Environmental Review Manager
Manager



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PUC EIP EERA Environmental Review

CC:

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Vegetation Management Planning Working Group Comments
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