

February 8, 2022

Via eDockets

Mr. Will Seuffert
Executive Secretary
Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

RE: Revised Vegetation Management Plan
Louise Solar
Docket No. IP 7039/WS-20-647

Mr. Seuffert:

EERA, on behalf of the interagency Vegetation Management Planning Work Group (VMPWG), respectfully submits comments on the Louise Solar Vegetation Management Plan (VMP).

The VMPWG has reviewed draft versions of the VMP and the revised VMP submitted by Louise Solar on October 22, 2021. The VMPWG does not recommend any action by the commission at this time, but is providing comments to facilitate transparency in the record as the VMPWG works with Louise 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 and includes a range of potential native seed mixes that meet the applicant's objectives of establishing native perennial vegetation that¹:

- Creates pollinator and other wildlife habitat.
- Improves soil health through accumulation of soil organic matter.
- Increases water infiltration by restricting overland flow and opening the soil structure.
- Protects surface water by minimizing soil erosion and overland transport.

¹ Louise Solar Revised Vegetation Management Plan, October 22, 2021, edockets number [202110-179032-03](#).

- Protects ground water through limited and directed use of chemical fertilizers and pesticides.

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 management plan. The VMPWG provides these specific comments on the revised plan and recommends that Louise Solar address these comments in its pre-construction VMP submittal:

1. Seed Mixes

- BWSR recommends use of the Low Growing Solar Array Mixes rather than the state seed mixes proposed. The Low Growing Solar Array mixes are specifically designed with low growing species for solar sites across the state and are suitable for a range of soil conditions. A link to state seed mixes can be found on BWSR's website [Seed Mixes | MN Board of Water, Soil Resources \(state.mn.us\)](https://www.bwsr.state.mn.us/seed-mixes). The state seed mixes currently proposed for use contain several taller species that are not suitable for solar sites. In addition to height concerns, taller species generate more thatch, which creates fire-hazards and impedes growth of other species if not removed from site.
- EERA and partner agencies request that the applicant provide a list of species substitutions for each seed mix. The applicant can work directly with EERA, BWSR, and DNR or use the seed substitution list provided by BWSR ([Seed Substitution list \(state.mn.us\)](https://www.bwsr.state.mn.us/seed-substitution-list)). The goal is to ensure that the ecological niche and guild of a plant species is retained when substitutions are necessary.

2. Herbicides and Weed Control

- Managing weeds is important in establishing native vegetation. The applicant is advised that widespread application of herbicides may act as a pre-emergent and reduce germination of desired vegetation.
- 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 DNR and BWSR when integrating cover crops with seed mixes.

3. Updates to the Vegetation Management Plan

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

4. Habitat Friendly Solar

- It is likely that Louise Solar would meet the requirements of the Habitat Friendly Solar Program. BWSR recommends that Habitat Friendly Solar be considered based on the goal of creating pollinator and wildlife habitat. Louise Solar could pursue this option once final seed mixes and monitoring protocol have been finalized.

In summary, EERA recommends that the applicant continue to coordinate with the VMPWG as it finalizes the vegetation management plan, including the development of seed mixes and a list of species substitutions for each seed mix. The VMPWG looks forward to the successful site restoration of the Louise Solar Project. The VMPWG will provide additional review and recommendations to the commission as part of EERA's pre-construction compliance review.

Sincerely,

Jamie MacAlister, Environmental Review Manager



CC:

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