

April 25, 2022

**VIA ELECTRONIC FILING**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, MN 55101-2147

The Honorable James Mortenson  
Office of Administrative Hearings  
600 North Robert Street  
P.O. Box 64620  
Saint Paul, MN 55164-0620

**RE: Reply Comments**

**In the Matter of the Application of Hayward Solar LLC for a Site Permit under the Alternative Permitting Process for the up to 150 MW Hayward Solar Project in Freeborn County**

**MPUC Docket Nos. IP-7053/CN-21-112 and IP-7053/GS-21-113  
OAH Docket Nos. 5-2500-37666 and 5-2500-37667**

Dear Mr. Seuffert and Judge Mortenson:

Hayward Solar LLC (“Hayward Solar” or “Applicant”) submits these reply comments in response to the written comments submitted by the Department of Commerce, Energy Environmental Review and Analysis (“EERA”) staff on April 15, 2022, the Minnesota Department of Natural Resources (“MDNR”) on April 15, 2022, the interagency Vegetation Management Planning Work Group (“VMPWG”) on April 13, 2022, the Shell Rock River Watershed District (“SRR Watershed District”) on March 31, 2022, and members of the public before the close of the comment period on April 15, 2022. Hayward Solar also submits these reply comments in response to the oral public comments raised at the remote-access and in-person public hearings held on March 28 and 29, 2022, respectively, on Hayward Solar’s Site Permit Application (“SP Application”) and Certificate of Need Application (“CN Application”) for an up to 150-megawatt solar energy generating system and associated facilities in Freeborn County, Minnesota (the “Project”). Hayward Solar appreciates the agency and public participation in these dockets and the opportunity to offer this response.

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## **1. Response to EERA Staff Comments.**

On April 15, 2022, EERA staff filed hearing comments on the Sample Site Permit,<sup>1</sup> the Environmental Assessment (“EA”), and the direct testimony of Hayward Solar.<sup>2</sup> Hayward Solar provides the following responses to each of EERA staff’s comment.

### Section 4.3.8 (Beneficial Habitat).

EERA staff notes that Section 4.3.8 of the Sample Site Permit is titled “Beneficial Habitat” but incorporated two topics – beneficial habitat and a vegetation management plan (“VMP”). EERA staff recommended that this section be revised to only address beneficial habitat, and that the VMP be addressed in a separate special condition (discussed below). Hayward Solar has no objection to EERA staff’s proposed changes to Section 4.3.8 (Beneficial Habitat).

### Special Permit Condition Section 5.1 (Vegetation Management Plan).

EERA staff proposed including a special permit condition requiring the permittee to develop a VMP in coordination with the Department of Commerce, MDNR, Board of Water and Soil Resources, and Minnesota Pollution Control Agency, and file the VMP at least 14 days prior to the pre-construction meeting. The proposed special condition also includes a list of information to be included in the VMP.

As EERA staff notes, Hayward Solar has already developed its VMP in consultation with the MDNR and other state agencies. Hayward Solar has no objection to this special permit condition.

### Special Permit Condition Section 5.2 (Agricultural Impact Management Plan).

EERA staff proposed adding a special permit condition requiring that an agricultural impact mitigation plan (“AIMP”) be developed in coordination with the Minnesota Department of Agriculture (“MDA”) and filed with the Commission 14 days prior to the pre-construction meeting.

As EERA staff notes, Hayward Solar has already developed its AIMP in consultation with the MDA and other state agencies. The AIMP was filed with the SP Application and as Appendix C to the EA. Hayward Solar has no objection to this special permit condition.

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<sup>1</sup> As EERA staff notes, Section 4.3 of the Sample Site Permit is improperly numbered. After reaching Section 4.3.7 (Aesthetics), the section begins numbering again; thus, instead of being Section 4.3.8, the Topsoil Protection text is noted as Section 4.3.1.

<sup>2</sup> EERA Hearing Comments (April 15, 2022) (eDocket No. [20224-184798-01](#)).

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Special Permit Condition Section 5.3 (Independent Monitor).

EERA staff proposed adding a special permit condition requiring an independent monitor to ensure compliance with the site permit. EERA staff proposes to combine the roles of an independent monitor for site permit compliance with the independent monitor Hayward Solar plans to contract with to ensure compliance with the AIMP. EERA staff suggests that the independent monitor report to both EERA and MDA. EERA staff notes that MDA staff has indicated it has no objection to a shared monitoring function.

While Hayward Solar proposes the use of an independent monitor to ensure compliance with the AIMP, there is nothing in the record indicating that an independent monitor to ensure compliance with the site permit is appropriate or necessary for this Project. Hayward Solar is committed to coordinating with EERA throughout Project construction and restoration.

However, if the Commission elects to include such a provision in the site permit, Hayward Solar proposes that the condition clearly identify the agency/agencies to which the independent monitor would report.

Hayward Solar appreciates the language proposed by EERA staff in special permit condition Section 5.3 regarding coordination on the scope of the independent third-party monitor prior to construction. This language is consistent with the independent monitor condition proposed by EERA in other recent dockets (e.g., the Louise Solar site permit docket (MPUC Docket No. IP-7039/CN-20-647) and acknowledges that an independent monitor's scope of work will depend upon the particular project.

Hayward Solar proposes the following changes to the special permit condition proposed by EERA staff:

**5.3 Independent Monitor**

~~The Permittee shall employ an independent, third-party monitor to ensure compliance with this site permit.~~ Prior to construction, and in consultation with Department of Commerce, Energy Environmental Review and Analysis (EERA) staff and the Minnesota Department of Agriculture (MDA), the Permittee shall identify one independent, third party monitor for the construction phase and develop a scope of work for the monitor. ~~If the monitor will report to several agencies (e.g., the Minnesota Department of Agriculture and Commerce) the~~The scope of work must be developed in coordination with and approved by EERA staff and the MDA.~~all agencies. The scope of work must be approved by EERA and all agencies receiving monitoring reports.~~ This third-party

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monitor will report directly to and will be under the control of the EERA staff and MDA, in coordination with the Permittee. All costs for the monitor will be borne by the Permittee.

The Permittee shall file an approved scope of work for the monitor with the Commission 30 days prior to commencing construction. The Permittee shall file the name, address, email, phone number, and emergency phone number of the third-party monitor 14 days prior to commencing construction.

Special Permit Condition Section 5.4 (Noise Coordination).

EERA staff proposed adding a special permit condition requiring the permittee to coordinate with local residents, including the KOA campground, regarding potential noise impacts prior to the installation of any foundation posts. Hayward Solar has no objection to this special permit condition.

Special Permit Condition Section 5.5 (Snowmobile Trails).

EERA staff proposed adding a special permit condition requiring the permittee to coordinate with local snowmobile trail associations to reroute the Freeborn County Trail 133 (“Trail 133”) (snowmobile trail) “and any associated snowmobile trails impacted by the [Project].”

The amended access road to the Project Substation/operations and maintenance (“O&M”) facility and the new location of the SMMPA Switchyard will impact the current route of the existing Trail 133. Hayward Solar has discussed trail re-route options with the Freeborn County Snowmobile Trail Association (“Association”) and the Association has indicated it agrees with rerouting Trail 133 to allow this facility to be constructed and maintain Trail 133 use.<sup>3</sup> Hayward Solar has no objection to this special permit condition.

Special Permit Condition Section 5.6 (Perimeter Fencing).

EERA staff commented that potential impacts to wildlife, particularly deer, could be mitigated by placing visibility markers at appropriate locations along the Project’s perimeter fencing. EERA staff proposed adding a special permit condition requiring the permittee to place visibility markers at appropriate locations along the Project’s perimeter fencing to mitigate impacts to wildlife, and that the permittee be required to coordinate with the MDNR regarding to locations of visibility markers.

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<sup>3</sup> See Ex. HS-125 at 8 (CN and SP Application Amendment).

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Hayward Solar does not agree with this proposed special permit condition. EERA staff did not provide any data or other evidence indicating visibility markers are warranted for the Project. Further, the MDNR has not requested visibility markers be placed along the perimeter fencing. Hayward Solar believes the fencing currently proposed in the SP Application is appropriately protective of wildlife, including deer, and supported by the record.

#### Section 9.1 (Decommissioning Plan).

EERA staff recommends changes to the decommissioning plan permit condition requiring the permittee to file its decommissioning plan 14 days prior to the Project's pre-construction meeting. Hayward Solar has no objection to EERA staff's proposed changes to Section 9.1 but notes that EERA staff's comments did not include the full condition from the Sample Site Permit. For purposes of clarity, Hayward Solar proposes incorporating EERA staff's proposed changes into Section 9.1 of the Sample Site Permit, as follows:

#### **9.1 Decommissioning Plan**

The Permittee shall comply with the provisions of the most recently filed and accepted decommissioning plan. The initial version of the decommissioning plan was submitted for this project as part of the May 5, 2021, site permit application. The Permittee shall ~~file~~ ~~submit~~ an updated decommissioning plan, incorporating comments and information from the permit issuance process and any updates associated with final construction plans, with ~~to~~ the Commission at least fourteen 14 days prior to the ~~pre-operation~~ pre-construction meeting ~~and provide updates to the plan every five years thereafter.~~ The decommissioning plan shall be updated every five years following the commercial operation date. The decommissioning plan shall provide information identifying all surety and financial securities established for decommissioning and site restoration. The decommissioning plan shall provide an itemized breakdown of costs of decommissioning all project components, which shall include labor and equipment. The plan shall identify cost estimates for the removal of solar panels, racks, underground collection cables, access roads, transformers, substations, and other project components. The plan may also include anticipated costs for the replacement of panels or repowering the project by upgrading equipment.

The Permittee shall also submit the decommissioning plan to the local unit of government having direct zoning authority over the area in which the project is located. The Permittee shall ensure that it

carries out its obligations to provide for the resources necessary to fulfill its requirements to properly decommission the project at the appropriate time. The Commission may at any time request the Permittee to file a report with the Commission describing how the Permittee is fulfilling this obligation.

Hayward Solar will consider EERA staff's additional comments in preparing the updated decommissioning plan.

## **2. Response to VMPWG Comments.**

On April 13, 2022, EERA staff filed comments on behalf of the interagency VMPWG regarding the revised VMP filed by Hayward Solar.<sup>4</sup>

Hayward Solar remains committed to working with the MDNR regarding the VMP for the Project. Prior to filing the SP Application, Hayward Solar submitted a draft VMP to the MDNR and other state agencies for review and comment. The draft VMP was revised to address agency comments and the revised VMP was included in the SP Application.<sup>5</sup>

Large areas of hydric soils are present across the Project Area where historic wetlands were present prior to drainage (e.g., installation of drain tiles and judicial drainage ditches) or where wetlands are presently located. Few remaining surface water features exist as the area now has numerous drain tiles and judicial drainage ditches to remove water from agricultural fields. Most of the land in the Project Area has been actively farmed for a number of years and site soils are being drained sufficiently by the existing drainage tile system to create drier conditions that soil types alone would suggest (based upon desktop review of soil data for the VMP). Additionally, as noted in the AIMP prepared for the Project, while a majority of the Project site is mapped with hydric soils, historical aerial photography and the field wetland delineation indicates that these areas are successfully cropped year after year indicating the presence of subsurface drainage and limited existing wetlands. The Project Area is well drained through existing drainage systems such as drain tile and judicial drainage ditch systems. Hayward Solar will further evaluate drain tile locations and take this into account as final design/engineering is completed for the Project. Hayward Solar will restore, replace, or repair the existing drain tile across the Project site and avoid impacts to judicial drainage ditches to the greatest extent practicable.

Further, the Project's AIMP specifically addresses construction in the type of soil conditions present in the Project Area. Hayward Solar will follow the best management practices set forth in the AIMP during construction and operation, including erosion and sediment control measures.

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<sup>4</sup> VMPWG Comments on the Revised Vegetation Management Plan (April 13, 2022) (eDocket No. [20224-184700-01](#)).

<sup>5</sup> See Ex. HS-112 (SP Application Appendix E – Vegetation Management Plan).

Additionally, as outlined in the EA, Hayward Solar will take several steps during the 2022 growing season to ensure proper seed mixes for the site, including: collecting and analyzing soil samples, interviewing landowners and farmers who are familiar with the Project Area, re-evaluating the VMP to determine if any changes are needed, reviewing the availability of seed mixes for the 2023 growing season (the anticipated construction timeframe), and coordinating with MDNR staff. Hayward Solar will continue to consult and coordinate with the VMPWG regarding further development of the VMP, including coordination on review of seed mixes to ensure that seed mixes are compatible with the soil and hydrologic conditions of the Project site and discussions regarding monitoring.

### **3. Response to MDNR Comments.**

The MDNR's comments addressed soil conditions and limitations, water appropriation, facility lighting, wildlife-friendly erosion control, and the VMP.<sup>6</sup>

#### Soil Conditions and Limitations.

As discussed above, large areas of hydric soils are present across the Project Area where historic wetlands were likely present, but most of those areas have been drained (e.g., by installation of drain tiles and county judicial drainage ditches). The Project Area is well drained through existing drainage systems such as drain tile and judicial drainage ditch systems. Hayward Solar will restore, replace, or repair the existing drain tile across the Project site and avoid impacts to judicial drainage ditches to the greatest extent practicable. Further, the Project's AIMP specifically addresses construction in the type of soil conditions present in the Project Area.

#### Water Appropriation.

If dewatering is necessary, Hayward Solar will obtain a Water Appropriation Permit from the MDNR if the applicable permit thresholds are expected to be exceeded during construction.

#### Facility Lighting.

The MDNR recommended adding a special permit condition requiring the permittee to use shielded and downward facing lighting and LED lighting that minimizes blue hue at the Project substation and O&M building. The MDNR provided an example condition from a recent docket. Hayward Solar has no objection to including a special permit condition addressing this, but proposes the following changes to capture the MDNR's intent that it apply to the Project substation and the O&M building:

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<sup>6</sup> MDNR Comments (April 15, 2022) (eDocket No. [20224-184795-01](#)).

Permittee must use shielded and downward facing lighting and LED lighting that minimizes blue hue at the project substation [and O&M building](#). Downward facing lighting must be clearly visible on the plan and profile submitted for the project.

#### Wildlife-Friendly Erosion Control.

The MDNR recommended adding special permit condition requiring erosion control blankets to be limited to “bio-netting” or “natural netting” types and mulch products without synthetic (plastic) fiber additives. Hayward Solar has no objection to the special permit condition proposed by the MDNR.

#### VMP.

The MDNR also recommended that Hayward Solar work with the VMPWG to modify the draft VMP, specifically as it related to seed mixes and herbicide use. As noted above, Hayward Solar will continue to consult and coordinate with the VMPWG, which includes the MDNR, regarding further development of the VMP.

### **4. Response to SRR Watershed District Comments.**

Written comments by the SRR Watershed District were filed on March 31, 2022 in support of the Project.<sup>7</sup> The SRR Watershed District commented in support of the vegetation and habitat management plans included with Hayward Solar’s SP Application and the early coordination initiated by Hayward Solar, including presenting its strategies to improve groundcover with native vegetation within the Project Area. The SRR Watershed District also noted that a project of this nature can be restorative to soil nutrient levels while providing stabilization to topsoil that can be lost when agricultural lands are tilled. The SRR Watershed District stated that it plans to continue its discussions with Hayward Solar to mitigate any potential run-off or drainage risks that may be present during the 12-14 month construction phase. Hayward Solar appreciates the SRR Watershed District’s comments.

### **5. Response to Other Public Comments.**

Twelve members of the public spoke during the March 29, 2022 public hearing (in-person), offering support for the Project and the positive economic impact it will have on the community.<sup>8</sup> No members of the public spoke during the remote-access public hearing on March 28, 2022.<sup>9</sup>

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<sup>7</sup> Public Comment - Batch 1 (March 31, 2022) (eDocket No. [20223-184305-01](#)).

<sup>8</sup> See March 29, 2022 Public Hearing Transcript.

<sup>9</sup> See March 28, 2022 Public Hearing Transcript.

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LIUNA Minnesota & North Dakota,<sup>10</sup> the International Union of Operating Engineers Local 49 (“IUOE Local 49”),<sup>11</sup> and the North Central Regional Council of Carpenters<sup>12</sup> submitted written comments before the close of the public comment period on April 15, 2022, expressing support for the Project because it would provide significant economic benefits and create construction jobs in the region. Hayward Solar appreciates the support of these organizations.

During the public comment period, written comments were submitted by twenty-three members of the public.<sup>13</sup> The comments included a broad range of topics, including: economic benefits such as jobs, tax revenue, and providing a diverse source of income for landowners; positive impacts on the land through native pollinator plantings; improved drainage; benefits to agricultural land by allowing the land to rest during the life of the Project; and the benefits of renewable energy. Hayward Solar appreciates the comments of these members of the public.

## 6. Conclusion.

These reply comments have been e-filed today through [www.edockets.state.mn.us](http://www.edockets.state.mn.us). A copy of this filing is also being served upon the persons on the Official Service Lists of record. Please let me know if you have any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A

*/s/ Jeremy P. Duehr*

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<sup>10</sup> LIUNA Minnesota & North Dakota Reply Comments (March 24, 2022) (eDocket No. [20223-184097-01](#)).

<sup>11</sup> IUOE Local 49 Comments (April 8, 2022) (eDocket No. [20224-184572-01](#)).

<sup>12</sup> North Central Regional Council of Carpenters Comments (April 15, 2022) (eDocket No. [20224-184825-01](#)).

<sup>13</sup> See Public Comment - Batch 1 (March 31, 2022) (eDocket No. [20223-184305-01](#)), Public Comments (April 14, 2022) (eDocket No. [20224-184789-02](#)), and Public Comment -Todd Hinrichs (April 19, 2022) (eDocket No. [20224-184912-02](#)).

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**In the Matter of the Application of  
Hayward Solar LLC for a Certificate of  
Need for the up to 150 MW Hayward  
Solar Project in Freeborn County,  
Minnesota**

**MPUC Docket No. IP-7053/CN-21-112**

**OAH Docket Number: 5-2500-37666**

**CERTIFICATE OF SERVICE**

**In the Matter of the Application of  
Hayward Solar LLC for a Site Permit  
for the up to 150 MW Hayward Solar  
Project in Freeborn County, Minnesota**

**MPUC Docket No. IP-7053/GS-21-113**

**OAH Docket Number: 5-2500-37667**

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Breann L. Jurek certifies that on the 25th day of April, 2022, she e-filed on behalf of Hayward Solar LLC, a true and correct copy of the following documents:

1. Response to Public Hearing Comments;
2. Certificate of Service.

to the Minnesota Public Utilities Commission, via edockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)). Said document was also served on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: April 25, 2022

*Signed: /s/ Breann L. Jurek*

*Fredrikson & Byron, P.A.*

*200 South Sixth Street*

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*Minneapolis, MN 55402*

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-112_Official CC Service List
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-112_Official CC Service List
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-113_Official CC Service List
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James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620  St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_21-113_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-113_Official CC Service List

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Sean	Sosa	ssosa@arevonenergy.com	Arevon	8800 N Gainey Center Dr Ste 250  Scottsdale, AZ 85258	Electronic Service	No	OFF_SL_21-113_Official CC Service List
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