

April 14, 2022

Via eDockets

Public Advisor
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

RE: Revised Vegetation Management Plan
Sherco Solar
Docket No. E-002/GS-21-191

Public Advisor:

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

The VMPWG has reviewed draft versions of the VMP and the revised VMP submitted by Sherco Solar on December 1, 2021. The VMPWG is not recommending any action by the Commission at this time, but is providing comments to facilitate transparency in the record as the VMPWG works with the applicant to arrive at a VMP that is adequate to meet pre-construction compliance filing requirements.

Xcel Energy is pursuing the Habitat Friendly Solar “gold standard” for the revegetation of the Sherco site. If permitted, Sherco will be the largest solar facility in Minnesota with over 3,000 acres. Given the scale of the site, the VMPWG has significant concerns that the site can be restored as proposed. The VMPWG has expressed concerns about the timing of restoration activities, the scale of restoration activities, and seed mixes in comments submitted to the applicant.

Obtaining site specific seed mixes for a project of this size could be difficult. The VMPWG recommends a phased approach to seeding and the development of defined management units. We believe a more strategic approach to revegetating such a large area has the greatest potential for success during seed establishment and achieving short and long-term management objectives. It may also provide cost savings by limiting establishment risk to smaller management units. The VMP attempts to address these concerns, but falls short of having a plan that lays out how restoration at this scale will be accomplished and managed over time to meet management objectives.

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:

1. Management Units and Monitoring Plan

- The VMPWG recommends Sherco clearly define management units for seeding, monitoring, and vegetation management.
- Provide a monitoring plan for seeding, establishment, and long-term management phases.
- Per NPDES permit requirements, once construction begins, no soils can be left bare for more than 2 weeks if not being worked on. It is not clear from the plan how soils will be stabilized across the site during and after construction.

2. Site Preparation and Seeding

- The plan does not specify who is responsible for site preparation prior to seeding. The VMPWG strongly recommends an experienced restoration specialist contractor for site preparation and seeding through the establishment phase.

3. Seed Mixes

- EERA and partner agencies request further coordination to develop 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.state.mn.us/bwsr/seedsubstitutionlist/)). The goal is to ensure that the ecological niche and guild (cool-season grass, warm-season grass, sedges/rushes, legume forb, and non-legume forb) of a plant species is retained when substitutions are necessary.
- Seed mixes should not include state-listed species that are classified as endangered, threatened, or special concern.
- Based on the site assessment forms and seed mixes included in the VMP, the project **will not** meet the standard in year 3 for spring blooming forbs and milkweed.
- Seed availability in the quantities required may be difficult to obtain. The VMPWG recommends a phased approach to seeding to ensure seed availability and monitoring of germination rates for successful establishment and long-term management.

4. 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.

In summary, EERA recommends that the applicant work directly with the VMPWG to develop a plan that is achievable and meets Habitat Friendly Solar standards. Successful site restoration for this project is in everyone's interest and a VMP for a project of this scale must show how the site will be successfully restored and managed. The VMPWG will provide additional review and recommendations to the commission as part of EERA's pre-construction compliance review.

Sincerely,

A handwritten signature in black ink, appearing to read 'JMac', is positioned above the name of the signatory.

Jamie MacAlister, Environmental Review Manager

CC:

Louise Miltich, EERA

Scott Ek, PUC

Dan Shaw, BWSR

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