

Sherco Solar

Sherburne County, Minnesota

Agency Responses

U.S. Army Corps of Engineers



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ST. PAUL DISTRICT
180 FIFTH STREET EAST, SUITE 700
ST. PAUL, MN 55101-1678

01/19/2021

Regulatory File No. MVP-2021-00109-DWW

THIS IS NOT A PERMIT

Mr. William Risse
National Grid Renewables
8400 Normandale Lake Boulevard, Suite 1200
Bloomington, MN 55437

Dear Mr. Risse:

We have received your submittal described below. You may contact the Project Manager with questions regarding the evaluation process. The Project Manager may request additional information necessary to evaluate your submittal.

File Number: MVP-2021-00109-DWW

Applicant: Sherco Solar LLC

Project Name: Sherco Solar LLC Proposed Solar Project

Project Location: Section 5 of Township 33 North, Range 28, Sherburne County, Minnesota (Latitude: 45.3795642236578; Longitude: -93.8500811141509)

Received Date: 01/19/2021

Project Manager: Daryl Wierzbinski
(218) 788-6406
Daryl.W.Wierzbinski@usace.army.mil

Additional information about the St. Paul District Regulatory Program can be found on our web site at <http://www.mvp.usace.army.mil/missions/regulatory>.

Please note that initiating work in waters of the United States prior to receiving Department of the Army authorization could constitute a violation of Federal law. If you have any questions, please contact the Project Manager.

Thank you.

U.S. Army Corps of Engineers
St. Paul District
Regulatory Branch



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ST. PAUL DISTRICT
180 FIFTH STREET EAST, SUITE 700
ST. PAUL, MN 55101-1678

January 20, 2021

Programs and Project Management Division

SUBJECT: 2104 - Sherco Solar Project in Sherburne County, MN

William Risse, Permitting Specialist
Nationalgrid Renewables
8400 Normandale Lake Boulevard, Suite 1200
Bloomington, MN 55437

Dear Mr. Risse:

We are replying to your January 15, 2021 letter regarding views and comments on your proposed Sherco Solar project located in Sherburne County, MN.

The project as outlined in your letter will not affect any existing U.S. Army Corps of Engineers civil works projects, and we do not anticipate future impacts to any Corps civil works projects by the St. Paul District.

The proposed project is located within the St. Paul District's Regulatory jurisdiction. We are forwarding a copy of your letter to the St. Paul Regulatory Office, U.S. Army Corps of Engineers, 180 5th Street East, St. Paul, Minnesota 55101-1678, concerning permit requirements. You may also contact the Regulatory Office at 651-290-5525 or mvp-reg-inquiry@usace.army.mil.

Please note that this letter does not eliminate the possibility that other permits and authorizations, including state and local, may be needed.

Sincerely,

A handwritten signature in black ink, reading "Chris Erickson", is positioned below the "Sincerely," text.

Christopher R. Erickson, PE, PMP
Assistant Deputy for Programs and
Project Management

cc:
CEMVP-OP-Regulatory

From: [Wierzbinski, Daryl W CIV USARMY CEMVP \(USA\)](#)
To: [William Risse](#)
Subject: [External] FW: contact information
Date: Friday, January 22, 2021 11:26:00 AM

William,

Thank you for your time today to discuss the proposed Sherco Solar project area in Sherburne County, Minnesota.

We would suggest to keep us informed about work in waters/wetlands within the project site for permitting purposes under Section 404 of CWA.

Supplemental information (wetland delineations) may be appropriate for the project area to identify the aquatic resources. Approved jurisdictional requests for aquatic resources could also be submitted after the resources have been identified.

Thank you.

Daryl W. Wierzbinski

U.S. Army Corps of Engineers, Duluth office

600 South Lake Avenue, Suite 211

Duluth, Minnesota 55802

Phone: 218 788-6406

Email: daryl.w.wierzbinski@usace.army.mil <<mailto:daryl.w.wierzbinski@usace.army.mil>>

Information on Corps of Engineers Regulatory Program status during the COVID-19 pandemic can be found at:
<https://www.mvp.usace.army.mil/missions/regulatory>

We are pleased to introduce our new paperless communication procedures in Minnesota. Requests for action (pre-application consultations, permit applications, requests for delineation concurrences, requests for jurisdictional determinations, and mitigation bank proposals) should be sent directly to the following email: usace_requests_mn@usace.army.mil. Please include the county name in the subject line of the email (e.g. Washington County). These changes will improve efficiency, reduce costs and reduce the environmental footprint. Additional information can be found in our public notice located here:

<http://www.mvp.usace.army.mil/Missions/Regulatory.aspx>

Agency Responses

U.S. Fish and Wildlife Service

From: [Marsh, Dawn S](#)
To: [William Risse](#)
Subject: Re: [EXTERNAL] RE: Sherco Solar- Notification of Proposed Project
Date: Friday, January 22, 2021 9:24:03 AM
Attachments: [Outlook-z42isfmj.png](#)
[Outlook-gd2balsi.png](#)
[Outlook-u45slojo.png](#)
[Outlook-ivwnqocu.png](#)
[Outlook-pyecw4wv.png](#)
[Outlook-o5taxdb4.png](#)
[Outlook-tt3aowb5.png](#)
[Outlook-45uzqbix.png](#)

Good morning,

The U.S. Fish and Wildlife Service received your request for technical assistance with an environmental review, specifically concerning threatened and endangered species under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1544). We provide technical assistance through our [Information for Planning and Consultation \(IPaC\)](#) system. You can access the information you're looking for regarding federally listed species that could occur in your project area through IPaC by entering the geographic and activity details for your project. The system will generate an Official Species List, a list of federally listed species and designated critical habitat that may be impacted by your project. The species list also will include any species proposed for listing and any areas proposed as critical habitat that overlap with the project area. You then can refer to our [Section 7 website](#) for guidance and [technical assistance](#), including [step-by-step instructions](#) for making effects determinations for each species that might be present. If there is no suitable habitat for the species that IPaC indicates, then the appropriate determination is No Effect. You do not need to consult further with us for No Effect determinations, please simply document the logic and conclusion for your files.

To complete consultation specifically for northern long-eared bat (NLEB), please use our online assisted determination key ("d-key"). This tool streamlines consultation under the 2016 rangewide programmatic BO for the 4(d) rule. The d-key helps to determine if prohibited take might occur and, if not, will generate an automated verification letter. No further review by us is necessary. You'll find the information you need at the links below.

[NLEB Section 7 consultation](#)

[Key to the NLEB 4\(d\) rule for federal actions that may affect](#)

[Instructions for the NLEB 4\(d\) assisted d-key](#)

Please let me know if you have any questions.

Thank you,
Dawn

Dawn Marsh (she/her/hers) | Fish and Wildlife Biologist
U.S. Fish & Wildlife Service | Minnesota-Wisconsin Field Office
4101 American Blvd. E., Bloomington, MN 55425
Tel: (952) 252-0092 x 202*
*Teleworking - please email to schedule a call

From: William Risse <wrisse@nationalgridrenewables.com>

Sent: Friday, January 15, 2021 3:45 PM

To: Twin Cities, FW3 <TwinCities@fws.gov>
Cc: Melissa Schmit <melissa@nationalgridrenewables.com>
Subject: [EXTERNAL] RE: Sherco Solar- Notification of Proposed Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To whom it may concern,

My apologies, I previously provided incorrect map information in my recent correspondence. Please find the attached updated letter regarding the proposed Sherco Solar Project, located in Sherburne County, Minnesota. The purpose of this letter is to inform your organization of the proposed Project, seek your input regarding any permits and approvals that may be required, and identify interests your organization may have in the Project site or associated study area. We welcome any comments your agency may have at this time and throughout the permit application process. Any written agency comments provided in response to this letter will be incorporated into the PUC's review process.

Regards,
William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: William Risse <wrisse@nationalgridrenewables.com>
Sent: Friday, January 15, 2021 3:20 PM
To: TwinCities@fws.gov
Cc: Melissa Schmit <melissa@nationalgridrenewables.com>
Subject: Sherco Solar- Notification of Proposed Project

To whom it may concern,

Please find attached letter regarding the proposed Sherco Solar Project, located in Sherburne County, Minnesota. The purpose of this letter is to inform your organization of the proposed Project, seek your input regarding any permits and approvals that may be required, and identify interests your organization may have in the Project site or associated study area. We welcome any comments your agency may have at this time and throughout the permit application process. Any written

agency comments provided in response to this letter will be incorporated into the PUC's review process.

Regards,
-William



952.988.9000



William Risse

Permitting Specialist

P 952.300.9476

E wrisse@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

Agency Responses

Federal Aviation Administration

Xcel Energy
Docket No. E-002/GS-21-191
Docket No. E-002/TL-21-190
Docket No. E-002/TL-21-189
April 2021



Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2021-AGL-2575-OE

Issued Date: 02/24/2021

William Risse
Sherco Solar, LLC
8400 Normandale Lake Boulevard
Suite 1200
Bloomington, MN 55437

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Solar Panel Array1_NW
Location:	Becker, MN
Latitude:	45-26-30.54N NAD 83
Longitude:	94-01-01.80W
Heights:	993 feet site elevation (SE) 18 feet above ground level (AGL) 1011 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or:

____ At least 10 days prior to start of construction (7460-2, Part 1)
__X__ Within 5 days after the construction reaches its greatest height (7460-2, Part 2)

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 M.

This determination expires on 08/24/2022 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.
- (c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, effective 21 Nov 2007, will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

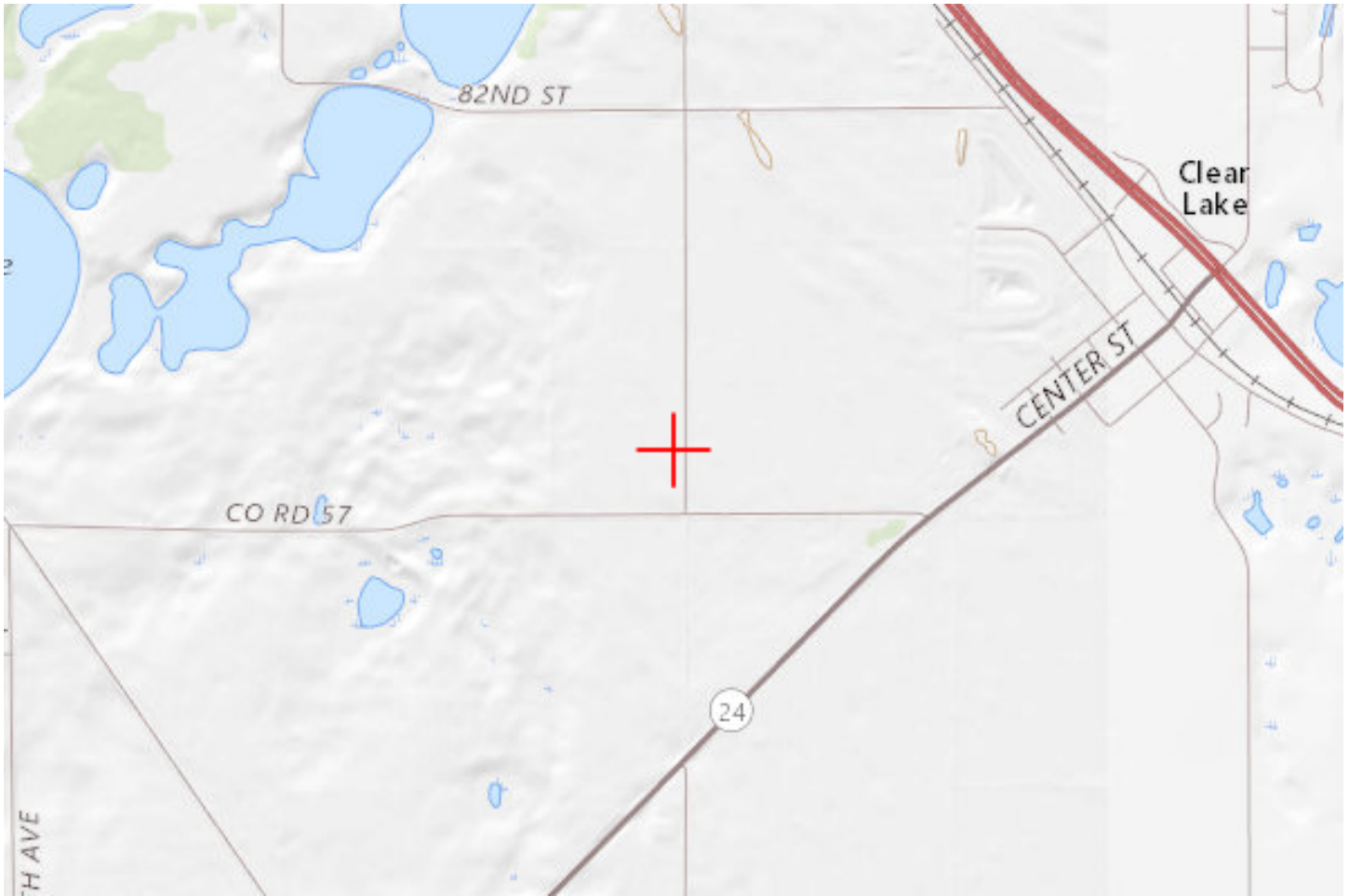
If we can be of further assistance, please contact our office at (847) 294-7458, or fred.souchet@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2021-AGL-2575-OE.

Signature Control No: 467411142-470431309

(DNE)

Fred Souchet
Specialist

Attachment(s)
Map(s)



Agency Responses

Lower Sioux Indian Community

From: [William Risse](#)
To: [Cheyanne St. John](#)
Cc: [Heine, Ellen L](#); [Rogers, Timothy G](#); [Brixius, Aaron P](#); [Jordan B. Burmeister](#); mary.otto@state.mn.us
Subject: RE: Proposed Sherco Solar Project- Requesting Input
Date: Wednesday, March 17, 2021 3:35:27 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[NG_Renewables_Logo_Primary_RGB_small_b3464f9a-abea-443c-8d43-87fd96c8afec.png](#)
[LinkedInIcon_8e0cea1f-d234-405f-8a61-4afe010bf11b.png](#)
[TwitterIcon_ff6acde5-6940-4a01-92b6-0ef9db8c446d.png](#)
[WebIcon_e1c44bce-dc58-4738-94a6-8941e49d8897.png](#)

Thank you, Cheyanne. Feel free to reach out at any time.

Have a good afternoon,
-William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: Cheyanne St. John <cheyanne.stjohn@lowersioux.com>
Sent: Wednesday, March 17, 2021 3:32 PM
To: William Risse <wrisse@nationalgridrenewables.com>
Cc: Heine, Ellen L <Ellen.L.Heine@xcelenergy.com>; Rogers, Timothy G <timothy.g.rogers@xcelenergy.com>; Brixius, Aaron P <aaron.p.brixius@xcelenergy.com>; Jordan B. Burmeister <jordan@nationalgridrenewables.com>; mary.otto@state.mn.us
Subject: RE: Proposed Sherco Solar Project- Requesting Input

Thank-you for the information. Our office will add this to our review roster and contact you if any concerns arise.

Cheyenne St. John | Lower Sioux Indian Community
Tribal Historic Preservation Officer
507.697.8672 Office | 507.697.6321 Wk Cell

Agency Responses

Shakopee Mdewakanton Sioux Community

From: [William Risse](#)
To: [Leonard Wabasha \(TO\)](#)
Cc: ["Heine, Ellen L"; "Rogers, Timothy G"; "Brixius, Aaron P"; Jordan B. Burmeister; "mary.otto@state.mn.us"](#)
Subject: RE: Proposed Sherco Solar Project- Requesting Input
Date: Thursday, March 4, 2021 9:43:50 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[NG_Renewables_Logo_Primary_RGB_small_b3464f9a-abea-443c-8d43-87fd96c8afec.png](#)
[LinkedInIcon_8e0cea1f-d234-405f-8a61-4afe010bf11b.png](#)
[TwitterIcon_ff6acde5-6940-4a01-92b6-0ef9db8c446d.png](#)
[WebIcon_e1c44bce-dc58-4738-94a6-8941e49d8897.png](#)

Thank you for the feedback, Leonard. As noted in our letter, we are still looking to survey a very small portion of our project area this Spring. We will be in touch following completion of those efforts.

-William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: Leonard Wabasha (TO) <leonard.wabasha@shakopeedakota.org>
Sent: Wednesday, March 3, 2021 4:26 PM
To: William Risse <wrisse@nationalgridrenewables.com>
Cc: 'Heine, Ellen L' <Ellen.L.Heine@xcelenergy.com>; 'Rogers, Timothy G' <timothy.g.rogers@xcelenergy.com>; 'Brixius, Aaron P' <aaron.p.brixius@xcelenergy.com>; Jordan B. Burmeister <jordan@nationalgridrenewables.com>; 'mary.otto@state.mn.us' <mary.otto@state.mn.us>
Subject: RE: Proposed Sherco Solar Project- Requesting Input

Dear William Risse

Thank you for your correspondence regarding the Sherco Solar Project. Please keep us informed of the project and also please send a copy of the Archaeological Study when complete. Thanks again and Have a Great Day...

Respectfully,

Leonard Wabasha
Director Cultural Resources

From: William Risse <wrisse@nationalgridrenewables.com>
Sent: Wednesday, March 3, 2021 3:31 PM
To: CulturalResources <CulturalResources@ShakopeeDakota.org>
Cc: Heine, Ellen L <Ellen.L.Heine@xcelenergy.com>; Rogers, Timothy G <timothy.g.rogers@xcelenergy.com>; Brixius, Aaron P <aaron.p.brixius@xcelenergy.com>; Jordan B. Burmeister <jordan@nationalgridrenewables.com>; mary.otto@state.mn.us
Subject: Proposed Sherco Solar Project- Requesting Input

This message came from **outside the organization**. Do Not click on links, open attachments or respond unless you know the content is safe.

Hello Mr. Wabasha,

Mary Otto passed me your contact information so that we could update you and the Shakopee community regarding Xcel Energy's proposed solar energy project in Sherburne County, Minnesota. Attached, please find a letter outlining Xcel Energy's plans for the 460 MW Sherco Solar Project. We welcome any comments from your community.

Regards,
-William



952.988.9000



William Risse
Permitting Specialist

P 952.300.9476

E wrisse@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

~~~~~  
The information contained in this message is confidential. If you are not the intended recipient, dissemination or copying of this information is prohibited.  
If you have received this communication in error, please notify the sender and delete the message from your system. Thank you!  
~~~~~

Agency Responses

Mille Lacs Band of Ojibwe

From: [William Risse](#)
To: [Terry Kemper](#)
Cc: [Heine, Ellen L](#); timothy.g.rogers@xcelenergy.com
Subject: RE: Proposed Sherco Solar Project- Requesting Input
Date: Thursday, March 4, 2021 2:04:10 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[NG_Renewables_Logo_Primary_RGB_small_b3464f9a-abea-443c-8d43-87fd96c8afec.png](#)
[LinkedInIcon_8e0cea1f-d234-405f-8a61-4afe010bf11b.png](#)
[TwitterIcon_ff6acde5-6940-4a01-92b6-0ef9db8c446d.png](#)
[WebIcon_e1c44bce-dc58-4738-94a6-8941e49d8897.png](#)

Hi Terry,

Thanks for reaching out.

A Phase 1 Cultural Resource Survey has been completed for approximately ninety eight percent of the Project area to date. All work including background studies and pedestrian surveys was conducted in accordance with *Minnesota SHPO Manual for Archaeological Survey Projects*, and the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation*. For the Project area that has been surveyed to date, no culturally significant resources have been identified. The remaining two percent of the project will be surveyed once suitable conditions occur in the spring of 2021. We will then engage with the MN-SHPO to obtain concurrence at that time.

Let me know if you have any other questions. Thank you,
-William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: Terry Kemper <Terry.Kemper@millelacsband.com>
Sent: Thursday, March 4, 2021 1:50 PM
To: William Risse <wrisse@nationalgridrenewables.com>
Subject: RE: Proposed Sherco Solar Project- Requesting Input

Has there been a archaeology survey done on the property?

From: William Risse <wrisse@nationalgridrenewables.com>
Sent: Wednesday, March 03, 2021 3:32 PM
To: Terry Kemper <Terry.Kemper@millelacsband.com>

Cc: Heine, Ellen L <Ellen.L.Heine@xcelenergy.com>; Rogers, Timothy G <timothy.g.rogers@xcelenergy.com>; Brixius, Aaron P <aaron.p.brixius@xcelenergy.com>; Jordan B. Burmeister <jordan@nationalgridrenewables.com>; mary.otto@state.mn.us
Subject: Proposed Sherco Solar Project- Requesting Input

Hello Mr. Kemper,

Mary Otto passed me your contact information so that we could update you and the Mille Lacs community regarding Xcel Energy's proposed solar energy project in Sherburne County, Minnesota. Attached, please find a letter outlining Xcel Energy's plans for the 460 MW Sherco Solar Project. We welcome any comments from your community.

Regards,
-William



952.988.9000



William Risse

Permitting Specialist

P 952.300.9476

E wrisse@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

From: [William Risse](#)
To: [Terry Kemper](#)
Cc: [Ellen Heine \(Xcel\)](#); [Rogers, Timothy G](#); [Melissa Schmit](#)
Subject: RE: Proposed Sherco Solar Project- Requesting Input
Date: Thursday, April 1, 2021 9:44:36 AM
Attachments: [image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[NG_Renewables_Logo_Primary_RGB_small_b3464f9a-abea-443c-8d43-87fd96c8afec.png](#)
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[WebIcon_e1c44bce-dc58-4738-94a6-8941e49d8897.png](#)
[NONPUBLIC cultural reports_20210401.pdf](#)
[Fig_01_Sherco_Project_Location.pdf](#)
[Sherco_Figure_2.pdf](#)

Hello Terry,

Apologies on the delay in getting back to you. I hope you are doing well. Following up on our conversations from a couple of weeks ago, attached are the two cultural reports (non-public, please do not distribute) that were completed for the Sherco Solar Project. We plan to submit these to the MN SHPO following completion of survey for the remainder of the Project Area (approximately 2% remaining) in the Spring of this year. The reports identify the methods utilized for the survey as well as the overall study area. As noted during our phone discussion, the entirety of the Project Area is located on privately owned lands under lease or purchase option to accommodate the renewable energy project.

We would also like to inquire if you are aware of any known resources associated with the Mille Lacs Band of Ojibwe within our Project Area. I have attached a map of our Project Area for your consideration.

We are more than happy to set up a discussion with you should you have any follow up questions.
Thank you,
-William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: Terry Kemper <Terry.Kemper@millelacsband.com>
Sent: Wednesday, March 10, 2021 3:53 PM
To: William Risse <wrisse@nationalgridrenewables.com>
Subject: RE: Proposed Sherco Solar Project- Requesting Input

Agency Responses

Minnesota Department of Commerce, Energy Environmental Review and Analysis

March 22, 2021

Ellen Heine
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55402

William Risse
National Grid Renewables
8400 Normandale Lake Blvd, Suite 1200
Bloomington, MN 55437

Dear Ms. Heine and Mr. Risse:

On January 27, 2021, the Department received a Solar Size Determination request for Sherco Solar, LLC's (a wholly-owned subsidiary of National Grid Renewables Development, LLC) proposed 600 MW Sherco Solar project in Sherburne County, being developed in collaboration with Northern States Power Company (dba Xcel Energy). On February 16, 2021, the Department received an amended Solar Size Determination for the proposed Sherco Solar project, reducing proposed project size to 460 MW. On February 26, 2021, the Department received an amended Solar Size Determination request for the proposed 460 MW Sherco Solar project, with an update to the description of ownership structure indicating that Xcel Energy proposes to develop the project in partnership with National Grid Renewables, LLC.

The Department is responsible for reviewing these applications to determine "whether a combination of solar energy generating systems meets the definition of large electric power generating plant and is subject to the commission's siting authority jurisdiction" (Minnesota Statute 216E.021, Subd. a).

NG Renewables is currently pursuing several separate utility-scale solar projects in Minnesota, but Xcel Energy will be the actual owner and operator of the Sherco Solar project. Based on information provided by the Applicant, and based on criteria established in the statute, the Department has determined that the Sherco Solar project is not associated with any of these planned solar projects in a way that would require them to be combined into a single project for purposes of the size determination. However, given that the project on its own is 460 MW (over 50 MW), the Department determines that Sherco Solar is subject to the Public Utilities Commission's siting authority and must be reviewed and permitted under the Power Plant Siting Act (Minnesota Statute 216E).

The Department reserves comment at this time on any of the other applications associated with this project and mentioned in the determination request, such as an exemption from a CN or separating the Sherco Solar project gen-tie into two separate transmission applications.

Xcel Energy has the right to dispute this determination with the Chair of the Public Utilities Commission.

I am available to answer any questions you might have.

Sincerely,

/s/ Louise Miltich
Energy Environmental Review and Analysis

cc: Bret Eknes, Public Utilities Commission
Jeremy Duehr, Fredrikson & Byron

Agency Responses

Minnesota Historical Society – State Historic Preservation Office

February 12, 2021

William Risse
Permitting Specialist
National Grid Renewables
8400 Normandale Lake Boulevard, Suite 1200
Bloomington, MN 55437

RE: Sherco Solar Energy Project
Sherburne County
SHPO Number: 2021-0804

Dear Mr. Risse:

Thank you for the opportunity to comment on the above referenced project. Information received on January 15, 2021 has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (Minn. Stat. 138.666).

According to your submittal, Sherco Solar is proposing to develop a 600 MW Solar Energy Facility (Project) in Sherburne County, Minnesota. The proposed project may include the installation of solar modules and associated equipment, fencing, access roads, two collection substation facilities, two 345 kV overhead transmission lines, on-site below-ground and above-ground electrical collection lines, and weather stations.

We recommend that a background literature review for architectural and archaeological resources be completed for this Project. We also recommend that a Phase Ia archaeological assessment be completed. If as a result of this assessment, a Phase I archaeological survey is recommended, this survey should be conducted. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking this type of research and archaeological surveys, please visit the website <http://www.mnhs.org/shpo/preservation-directory>, and select "Archaeologists, Contract" in the "Specialties" box.

The Project should consider not only direct impacts to cultural resources, but potential indirect impacts as well. The analysis completed for indirect impacts should take into account any introduction of visual, atmospheric or audible elements that may have an effect on cultural resources (both architectural properties and archaeological sites).

The resulting cultural resources report should include maps with clearly defined project areas including the location of the solar panels and associated equipment, any laydown yards, transmission lines, collector lines, access roads, and any other above-ground equipment structures (i.e. substations, weather stations, etc) in relation to any identified cultural resources (architectural properties and archaeological sites). The report should discuss ways in which the project will avoid impacting, both directly and indirectly, any cultural resources that are identified.

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

mn.gov/admin/shpo ■ mnshpo@state.mn.us

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact me at kelly.graggjohnson@state.mn.us.

Sincerely,

Kelly Gragg-Johnson

Kelly Gragg-Johnson
Environmental Review Specialist

Agency Responses

Minnesota Department of Natural Resources

Xcel Energy
Docket No. E-002/GS-21-191
Docket No. E-002/TL-21-190
Docket No. E-002/TL-21-189
April 2021

From: [William Risse](#)
To: [Collins, Melissa \(DNR\)](#)
Cc: [Melissa Schmit](#); [Warzecha, Cynthia \(DNR\)](#); [Heine, Ellen L](#); ["Rogers, Timothy G"](#); [Duehr, Jeremy](#); [Miltich, Louise \(COMM\)](#)
Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project
Date: Wednesday, April 7, 2021 10:22:38 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
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[NG Renewables Logo Primary_RGB_small_b3464f9a-abea-443c-8d43-87fd96c8afec.png](#)
[LinkedInIcon_8e0cea1f-d234-405f-8a61-4afe010bf11b.png](#)
[TwitterIcon_ff6acde5-6940-4a01-92b6-0ef9db8c446d.png](#)
[WebIcon_e1c44bce-dc58-4738-94a6-8941e49d8897.png](#)

Hi Melissa,

Thank you for the response. We are taking a look at this and will be in touch.

-William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>

Sent: Tuesday, April 6, 2021 4:32 PM

To: William Risse <wrisse@nationalgridrenewables.com>

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>; 'Rogers, Timothy G' <timothy.g.rogers@xcelenergy.com>; Duehr, Jeremy <jduehr@fredlaw.com>; Miltich, Louise

(COMM) <louise.miltich@state.mn.us>

Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project

Hi William,

Thank you so much for providing the updated seed mix and for incorporating some of DNR's suggestions. I am extremely pleased that this project is working towards the "gold standard" on BWSR's Solar Pollinator Scorecard. These suggestions from DNR are in no way trying to place excessive or unreasonable demands on the project, but rather are hoping to achieve the best outcome for all parties. I would like to clarify one point regarding seed mix design and the scorecard. The scorecard is referencing vegetation cover outcomes **after** planting and establishment, while the seed mix composition is the interagency (including BWSR) recommendation on how to achieve that cover. The seed mixes need to contain at least 40% perennial forbs in order to meet the 31% site vegetation cover goal.

Having 1% milkweed cover is a goal of the project in order to meet that requirement on the BWSR Solar Pollinator Scorecard. I would look at other milkweed varieties to include within your Mesic Array Seed Mix and find the options that are the most financially doable in order to meet this requirement. I would be happy to discuss this further with you or your consultant.

I can appreciate not including tall grasses within these seed mixes, but taller forbs would be more suitable because they are unlikely to cause significant shade issues since they will be less widely distributed, and the sandy, excessively drained nature of the site will limit the height potential of many species. I am concerned as to whether or not there will be adequate species diversity within the established forbs, and if *Rudbeckia hirta* will end up dominating the site based on the higher seeding rate of that species.

Regarding the Wet Mesic Array Mix, I appreciate that you have added *Asclepias incarnata*, though with how infrequently this mix will be used on the site, it is unlikely to contribute significantly to the 1% milkweed cover goal. My main issue with this seed list is that it contains an odd combination of upland (UPL), facultative-upland (FACU), and wetland-obligate (OBL) species. Because this is a transitional mix, there really shouldn't be UPL or OBL species in this mix. The species I suggested are common transitional species (mostly FACU, FAC, and FACW), but there are many that could work for this purpose and I would be happy to talk to with your consultant to find appropriate and cost-effective alternatives.

It's good to know that the project design is based on the results of a wetland delineation. Was a soil survey to verify panel placement and seed mix distribution conducted at the same time or will that be conducted later?

Finally, regarding fencing, I don't think we can make any assumptions about how deer use the Public Water wetland without data. I will defer to our Wildlife Manager and Nongame Wildlife

Specialist and their expertise and local knowledge of the area, so please reach out to them to discuss fencing. I agree that overall the project will provide many benefits to local wildlife, but it would be unfortunate if wildlife road mortalities increased unnecessarily. The solution may be as simple as incorporating a few fencing modifications. This is the guidance that is provided in the DNR's Commercial Solar Siting Guidance document:

"Fencing of a solar site has the potential to disrupt wildlife travel corridors. Project sites should be designed in a manner that does not disrupt significant wildlife travel corridors. Significant wildlife travel corridors are typically associated with streams, rivers, large wetlands, or other habitats. Fences can be modified to allow small openings for small animals to move in and out of the fenced area. Modified fencing for animal passage should only be used for specific sites on an as needed basis.

Fencing that will direct wildlife onto roads, especially high speed roads, should be avoided, as it results in wildlife fatalities and creates a safety issue for the motoring public. The DNR will provide comments during review of individual projects about when the use of fence setbacks from roads is warranted. The setback recommendation will be based on traffic volume and speed, as well as wildlife population levels in the area (primarily deer), and the presence of wildlife travel corridors.

The DNR recommends using 3-4 strand smooth fencing that is 4-5 feet high and does not use barbed wire. The use of a more open type of fencing allows wildlife to freely move in and out of the area. If chain link or woven wire fencing is used, then that fencing should be 8-10 feet high to ensure that deer do not attempt to jump the fence. Barbed wire should not be used at the top of the fence because deer can get entangled in the barbed wire. The result is injuries to the deer, fence repairs, and poor public relations for the operator of the solar project. An alternative design is to include a top guard angled out and upward at 45 degrees with 3-4 strands of smooth wire (no barbs) that would discourage trespassing. Solar developers should also review applicable codes and standards that may influence the type of fencing that is used at a site."

Thank you so much for your engagement with the DNR on this project. I would like to stress that our goal in coordination and with our comments is for Sherco Solar to have the best outcome possible. Please let me know if you have any other questions.

Thank you,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her

Minnesota Department of Natural Resources

1200 Warner Road

St. Paul, MN 55106

Phone: 651-259-5755

Email: melissa.collins@state.mn.us

mndnr.gov



From: William Risse <wrisse@nationalgridrenewables.com>

Sent: Thursday, April 1, 2021 9:30 AM

To: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; Ellen Heine (Xcel) <ellen.l.heine@xcelenergy.com>; 'Rogers, Timothy G' <timothy.g.rogers@xcelenergy.com>; Duehr, Jeremy <jduehr@fredlaw.com>; Miltich, Louise (COMM) <louise.miltich@state.mn.us>

Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project

Hi Melissa,

Thank you for the thoughtful and thorough response. Below, we tried to address each of the comments that you sent in your 3/11/2021 and 3/12/2021 emails. We'd be happy to set up a call to discuss any of these points if you would find it helpful.

-

Design and Consultation Response:

NHIS Request

We have incorporated the NHIS recommendations from December into our site and route permit application, which will be submitted shortly. Specifically, we have committed to implementing BMPs to help protect the Blanding's turtle during construction, and we have also committed to avoiding tree clearing during the loggerhead shrike nesting season (April 1 – July 31). Additionally, Xcel Energy will also report any loggerhead shrike sightings to the MNDNR. Our consultant also used their NHIS license to analyze the entire Solar Project Area and both transmission routes. We also initiated an updated NHIS request to cover our entire Project Area and transmission lines since the Project expanded following the initial request.

Wetland Delineation

We have completed a wetland delineation, and this data has been incorporated into our site plans that we provided to you. A very small portion of the project will be surveyed this spring (for

temporary laydown areas), and following completion of survey we plan to obtain a jurisdictional determination for the Project. No wetland permits are anticipated as we are avoiding impacts to wetland resources for the entire project.

Wildlife Fencing

We have committed to implementing wildlife friendly fencing for the Project in our permit application. This will consist of agricultural type fencing topped with smooth wire. We feel that the fencing will not impact most wildlife species, including birds and small mammals. Based on current land uses, we would not anticipate that large megafauna such as deer would regularly frequent the area surrounding the PWI waterbody (70113800) as there are no nearby woodlots or sheltering habitat for them. Therefore, we feel that the overall risk from the Project fencing in this area is low.

In addition to the fencing considerations, we feel that the establishment of native vegetation and long-term ground cover from the Project will have positive impacts on the water quality at that location. We would anticipate potential decreases in overall turbidity and sedimentation as over half of the land surrounding the waterbody will be taken out of agriculture and established as pollinator friendly habitat. This habitat and anticipated waterbody improvements should benefit many of the wildlife species that utilize the public waterbody.

-

Seed Mix Response:

-

We have incorporated much of the Guidance for Developing a Vegetation Establishment and Management Plan for Solar Facilities into our Vegetation management plan for the Project. We are lucky in Minnesota to have so many guidance documents from various agencies to assist in our planning efforts. The primary goal of the vegetation management plan is oriented toward certification under BWSR's Habitat Friendly Solar Program. Thus, while we incorporate aspects of the EERA guidance, we primarily utilized the BWSR certification process and scorecard system to guide our seed mixes and general vegetation management plans for the Project. The VMP we develop will be a living document that will continue to be updated as we collect data about the project site.

We appreciate your recommendations regarding seed mixes. To simplify Xcel's restoration processes, sourcing of seeds, and revegetation process following construction, we have developed a single seed mix that is appropriate for upland areas beneath our panels and surrounding our panels. We also anticipate this approach will allow for more efficient long-term management of the site while still providing a beneficial pollinator mix. Generally, this means that we developed a low growing mix throughout the site, and it precluded the incorporation of taller plantings due to panel shading concerns.

Our plans and seed mix are oriented toward meeting the "gold standard" of the BWSR Habitat Friendly Solar Program. We have attached the planning scorecard based on our seed mixes and project plans. With the current seed mixes, and other plans for the site, Xcel anticipates that should all go to plan, we would far exceed the "gold standard" of the scorecard with an anticipated score of 109.

We have tried to address your comments regarding each seed mix below with context for why we developed the mixes in the way that we did:

-

Mesic Array Mix:

40% forbs: While the DNR guidance from July 2020 recommends 40% forbs in the seed mix, the current BWSR Solar Pollinator Scorecard awards maximum points for the project if the site has at least 31% wildflower cover. All mixes for the project have at least 31% forbs (as measured by planted seeds per square foot), meaning the project will meet the highest requirement on the Scorecard. Additionally, the current BWSR Solar Pollinator Scorecard for established solar facilities has 35% wildflowers as the goal for the maximum points, which we are pursuing with our current plan.

Additional Early Spring Forbs (May):

All of the recommended early spring forbs are extremely difficult to propagate from seed. The size of the project makes installing plugs both logistically challenging and cost-prohibitive.

Monarch Species:

We appreciate this feedback and intend to plant milkweed on the site. However, planting milkweed at a high rate is cost prohibitive and we do not feel that we can justify a higher seed rate for milkweed based on current costs. Additionally, once established, we would anticipate milkweed to continue to propagate across the site, especially common milkweed.

20 forb species:

We recognize that the DNR guidance recommends 20 forb species per seed mix. However, our proposed mixes achieve the maximum score for species richness on the BWSR solar pollinator scorecard. Additionally, research presented by The Nature Conservancy at the 2019 Society for Range Management conference revealed that using a simpler seed mix would result in a planting that had greater species diversity than one from a more complex mix, likely due to higher seeding rates of species that are more likely to establish. Their findings indicate that species choice has a greater impact on the diversity of the planting than just species richness.

-

-

Wet-Mesic Mix:

We agree with your assessment that the wet-mesic mix is likely to be used sparingly onsite, if at all. The hydric soils are mucks that are primarily confined to existing ponds, so a wet-mesic mix would likely be planted only as a buffer if needed. We addressed the “20 forb” goal above, but we are concerned with the height of the species you selected. Any of the tall species you recommended are candidates to escape from the planted area and spread into the arrays, where they will shade the panels. Additionally, several of your recommendations are not commercially available. As recommended, we added swamp milkweed to the seed mix.

-

-

Wet Mix:

We have previously addressed the “20 forb” goal, as well as the “40% forb” goal. As recommended, we added marsh marigold to increase the early spring blooms and also included spotted Joe Pye

weed in the seed mix.

Thank you again,
-William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: William Risse <wrisse@nationalgridrenewables.com>

Sent: Friday, March 12, 2021 12:22 PM

To: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; 'Heine, Ellen L' <Ellen.L.Heine@xcelenergy.com>; 'Rogers, Timothy G' <timothy.g.rogers@xcelenergy.com>; Duehr, Jeremy <jduehr@fredlaw.com>; Miltich, Louise (COMM) <louise.miltich@state.mn.us>

Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project

Hi Melissa,

Thanks for sharing. We are reviewing the information and will be in touch.

Have a great weekend,
-William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>

Sent: Friday, March 12, 2021 10:48 AM

To: William Risse <wrisse@nationalgridrenewables.com>

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; 'Heine, Ellen L' <Ellen.L.Heine@xcelenergy.com>; 'Rogers, Timothy G' <timothy.g.rogers@xcelenergy.com>; Duehr, Jeremy <jduehr@fredlaw.com>; Miltich,

Louise (COMM) <louise.miltich@state.mn.us>

Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project

Hi William,

It just came to my attention that the [Guidance for Developing a Vegetation Establishment and Management Plan for Solar Facilities](#) document was completed earlier this month. This document is intended to provide guidance for applicants and permittees seeking solar permits in Minnesota as they develop vegetation establishment and management plans for their projects. The guidance document is the result of extensive collaboration among the Department of Commerce, Department of Agriculture, the Board of Soil and Water Resources, and the DNR. I hope you will find it helpful as you complete the required Vegetation Management Plan for the project.

I also see that an NHIS review was completed for the project. Please follow the avoidance measures listed in the December 11, 2020 NHIS letter regarding threatened and endangered species.

Thank you,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her

Minnesota Department of Natural Resources

1200 Warner Road

St. Paul, MN 55106

Phone: 651-259-5755

Email: melissa.collins@state.mn.us

mndnr.gov



From: Collins, Melissa (DNR)

Sent: Thursday, March 11, 2021 10:16 PM

To: William Risse <wrisse@nationalgridrenewables.com>

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; 'Heine, Ellen L' <Ellen.L.Heine@xcelenergy.com>; 'Rogers, Timothy G' <timothy.g.rogers@xcelenergy.com>; Duehr, Jeremy <jduehr@fredlaw.com>; Miltich, Louise (COMM) <louise.miltich@state.mn.us>

Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project

Hi William,

Thank you so much engaging with us during this early coordination process. I have reviewed the files you sent me as well as the seed mixes and have the following comments/questions:

Project Placement

- Has a wetland delineation has been conducted for the project area? It appears that some panels, access roads, and fence boundaries come right up to multiple wetland boundaries. I would make sure that the placement of project features complies with local wetland setback requirements.
- I am concerned by the extent to which Public Water Basin (70113800) in the NW corner of the project area will be fenced in and how this may impact wildlife use of the basin. There is the potential to route wildlife south of the wetland into an area where they would be trapped on the road between two fences. Please coordinate with Area Wildlife Manager, Fred Bengtson (fred.bengtson@state.mn.us) and Nongame Wildlife Specialist, Erica Hoaglund (erica.hoaglund@state.mn.us) to discuss the best placement and use of wildlife-friendly fencing.
- There are state-listed threatened and endangered species documented within the project area. I encourage you to submit an Natural Heritage Information Systems (NHIS) data request as soon as possible or use a license agreement to query the system and request a concurrence from DNR's Endangered Species Review Coordinator, Lisa Joyal (lisa.joyal@state.mn.us), to begin working through avoidance measures.

Seed Mixes

I referenced the DNR's [Prairie Establishment & Maintenance Technical Guide for Solar Projects](#), the Board of Water and Soil Resource's (BWSR) [Habitat Friendly Solar Program](#) and these Sample [Specifications](#) when evaluating the seed mixes you provided. The following are recommended design guidelines for pollinator seed mixes to be used for solar projects to help meet Habitat Friendly Solar standards. Multiple seed mixes may be used such as a grass-only mix under the panel and a pollinator seed mix between panels and on the edges of the site, however seed mixes must be designed with a sufficient percentage of forbs to meet the Habitat Friendly Solar Standards:

- Minimum seeding rate of 40 seeds/sq. ft.
- At least 40% of the total seeding rate as determined by seeds per sq. ft. should be composed of perennial forbs.
- 7 or more native grass/sedge species with at least 2 species of bunchgrass.
- 20 or more native forbs with at least 3 species in each bloom period: Early (April-May), Mid (June-August), and Late (August-October).
- Include species from multiple guilds and families including: cool season grasses; warm

season grasses; sedges/rushes; legume; and non-legume forbs

Mesic Array Mix

The dominant soil series in the area is Hubbard, which is sandy and excessively drained, therefore a dry prairie seed mix is most appropriate unless irrigation will be used. This species list has a good mix of warm/cool season grasses, bunching grasses, and legumes. The forbs list does not meet the 40% requirement as determined by seeds/sq. ft and there are less than 20 forbs species. Ideally, there would be more early-spring forbs that bloom before May in the list.

Here are some early-blooming species suggestions:

- *Anemone patens* (American Pasque Flower)
- *Antennaria neglecta* (Field Pussytoes)
- *Fragaria virginiana* (Wild Strawberry)
- *Geum triflorum* (Prairie Smoke)
- *Ranunculus rhomboideus* (Prairie Buttercup)

I would also increase the number of monarch-preferred species by incorporating more milkweeds and blazing stars. Some suggestions include:

- *Asclepias tuberosa* (Butterfly Weed)
- *Asclepias verticillata* (Whorled Milkweed)
- *Liatris aspera* (Rough Blazing Star)

Wet-Mesic Mix

The list states that this species list is for use in wetter areas under panels. Because Hubbard is the dominant soil type in the area, less well-drained soil types such as Isan and Seelyeville Muck will almost always correspond to wetlands, which should be avoided for panel placement. Therefore, this list will likely be more applicable to the narrow fringe/transition area surrounding wetlands. The list contains a mix of Upland (UPL) and Facultative-Upland (FACU) species combined with Obligate (OBL) species that are only found in wetlands, however I would refine this list by focusing more on transitional species. This list could also use more forbs to meet the recommended 20 species as well as more early-blooming species.

Some suggestions to include:

Grasses

- *Andropogon gerardii* (Big Bluestem)
- *Panicum virgatum* (Switchgrass)
- *Sorghastrum nutans* (Indian Grass)

Forbs

- *Anemone Canadensis* (Canada Anemone)
- *Apocynum cannabinum* (Indian Hemp)
- *Asclepias incarnate* (Swamp Milkweed)
- *Dalea candida* (White Prairie Clover)
- *Doellingeria umbellata* (Flat-topped White Aster)
- *Eryngium yuccifolium* (Rattlesnake Master)
- *Geum laciniatum* (Rough Avens)
- *Helenium autumnale* (Sneezeweed)
- *Helianthus grosseserratus* (Sawtooth Sunflower)
- *Impatiens capensis* (Spotted Touch-me-not)
- *Lathyrus palustris* (Marsh Vetchling)
- *Solidago gigantea* (Giant Goldenrod)

Wet Mix

The forbs list does not meet the 40% requirement as determined by seeds/sq. ft and there are less than 20 forbs species. There are also few early-spring forbs that bloom before May in the list.

Some suggestions include:

- *Bidens frondosa* (Devil's Beggarticks)
- *Cardamine bulbosa* (Spring Cress)
- *Caltha palustris* (Marsh Marigold)
- *Eutrochium maculatum* (Spotted Joe-pye Weed)
- *Lysimachia terrestris* (Swamp Candles)
- *Lysimachia thyrsiflora* (Tufted Loosestrife)
- *Scutellaria galericulata* (Marsh Skullcap)
- *Vernonia fasciculata* (Prairie Ironweed)

Please let me know if you have any questions.

Thank you,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her

Minnesota Department of Natural Resources

1200 Warner Road

St. Paul, MN 55106

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From: William Risse <wrisse@nationalgridrenewables.com>
Sent: Thursday, March 4, 2021 10:10 AM
To: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>
Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>; 'Heine, Ellen L' <Ellen.L.Heine@xcelenergy.com>; 'Rogers, Timothy G' <timothy.g.rogers@xcelenergy.com>; Duehr, Jeremy <jduehr@fredlaw.com>
Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project

Hello Melissa,

I hope you are doing well. We have a couple of updates regarding the Sherco Solar Project

1. We have attached preliminary seed mixes developed for the Project for the DNRs review and consideration. We would appreciate any feedback you have on these mixes. We have developed an upland mix as well as two options for wet mixes for the site based on localized conditions.
2. I have also attached a google earth KMZ of the Project Site Plan for your review and feedback. Please note, this design is preliminary and very well may change before we formally submit to the PUC via the site and route permit process. However, it is reflective of "big picture" plans for the site and should allow for additional review and comment.

We appreciate your review of these materials. If you have any questions, feel free to give me a call.
Thank you,
-William



952.988.9000



William Risse
Permitting Specialist

P 952.300.9476
E wrisse@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

From: William Risse <wrisse@nationalgridrenewables.com>
Sent: Tuesday, January 26, 2021 8:28 AM
To: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>

Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project

Thank you for the detailed response, Melissa. I will take this information back to my team and let you know if we have any followup.

-William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>

Sent: Monday, January 25, 2021 6:51 PM

To: William Risse <wrisse@nationalgridrenewables.com>

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>

Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project

Hi William,

I have received more input from DNR staff, and would like to add the following comments to our initial recommendations:

1. Previous utility-scale (PUC permitted) solar projects have faced major challenges when they have sited solar panels in wet areas. Issues that may be encountered are: trenches filled with water that cause construction delays, increased costs of pumping, stuck machinery, neighbor complaints-mud on roads, difficulty accessing facilities for maintenance, and Wetland Conservation Act (WCA) violations. Soils at solar sites should remain in good condition so that the site could eventually revert back farming. Soil mixing and compaction from construction activities can hinder that goal. Wet areas also present significant challenges for vegetation establishment, including pollinator habitat, and will require specific seed mixes corresponding to soil type.

The proposed project area is dominated by [Hubbard](#) soils, which are excessively and well drained. The Hubbard map unit may still contain hydric soil inclusions, as evidenced by the scattered NWI-mapped wetlands located throughout the project area. Smaller hydric soil map units as well as several large wetland complexes are also

mapped within the project area. Some of these wet areas may currently be farmed, however the DNR has observed that after farming activities cease, even with functioning tile or other mitigating measures, soils associated with swales and depressions often become wetter over time and interfere with solar site operations. The DNR recommends avoiding construction in wetlands and wet soil types (somewhat poorly drained to poorly drained soil types, hydric soils, and/or soils with a seasonally high surface water table). We also recommend conducting onsite field verifications to confirm soil types, either separately or in conjunction with a wetland delineation for the project area.

2. Subdivision 1 of Minnesota Statute 216B.1642 encourages site management practices that provide native pollinator habitat and reduce stormwater runoff and erosion at solar generation sites. The statute states: *To the extent practicable, when establishing perennial vegetation and beneficial foraging habitat, a solar site owner shall use native plant species and seed mixes under Department of Natural Resources "Prairie Establishment & Maintenance Technical Guidance for Solar Projects."* A link to this document was included with our original comments.

There is strong inter-agency support for providing pollinator habitat at utility-scale solar sites. The Department of Commerce, PUC, Department of Ag, BWSR, and the DNR have been developing vegetation management plan guidelines that should be available in the near future. Thus far, all PUC-permitted solar facilities have incorporated pollinator habitat. The DNR would like to work with Sherco Solar in developing a vegetation management plan to achieve the best ecological outcome.

3. Finally, once project details are available, please work closely with DNR wildlife staff to ensure that the type of fencing used and the placement of fencing are optimal for wildlife exclusion and/or passage as well as safety.

Thank you,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her

Minnesota Department of Natural Resources

1200 Warner Road

St. Paul, MN 55106

Phone: 651-259-5755

Email: melissa.collins@state.mn.us

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From: William Risse <wrisse@nationalgridrenewables.com>
Sent: Tuesday, January 19, 2021 2:26 PM
To: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>
Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>
Subject: RE: [External] RE: Sherco Solar- Notification of Proposed Project

Thank you for the feedback, Melissa. We plan to initiate an updated NHIS request encompassing the entire Project Area in the near future. As more information comes available regarding more detailed design, we will continue to keep you informed.

Thank you,
-William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>
Sent: Tuesday, January 19, 2021 1:55 PM
To: William Risse <wrisse@nationalgridrenewables.com>
Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Warzecha, Cynthia (DNR) <cynthia.warzecha@state.mn.us>
Subject: [External] RE: Sherco Solar- Notification of Proposed Project

Hi William,

Thank you for reaching out to me. We always appreciate it when proposers include us early in the development process. I have reviewed the letter and map that you provided. It would be helpful to see detailed project designs once they are available in order to provide more substantive comments, but for now I can offer you the following recommendations:

1. We recommend that a Natural Heritage Information System (NHIS) data review be conducted to determine if any records of rare species or rare natural resource features are located in proximity to the project. This can be conducted either by DNR Endangered Species Review staff, or by a license holder with concurrence from DNR staff. I see a current NHIS letter (attached) regarding Sherco Solar in our system for: T34N, R29W, Sections 15-22, 27, 28, and 34 as well as T34N, R30W, Sections 13 and 24. This is only a small portion of the project area identified in the letter you provided, and further review will be necessary to cover the western and southeastern portions of the project area. If you have not already, please submit either a review request or request for concurrence in one of the following ways:

- To request a DNR review, the NHIS Data Request Form and rate information, see the DNR website at <http://www.dnr.state.mn.us/eco/nhnrp/nhis.html> (link at bottom of page). If the review determines that rare species may be impacted, avoidance recommendations will be provided. In addition, further instructions on subsequent procedure and protocols for survey requirements may be provided.
- To request a concurrence from DNR, your agency must hold a license for the DNR rare features database. Submit your assessment of rare species and natural resource features with potential project impacts, and request a concurrence from Lisa Joyal, Endangered Species Review Coordinator (lisa.joyal@state.mn.us, 651-259-5109). Additional data layers that should be reviewed are MBS native plant communities, karst and calcareous fen features, Sites of Biodiversity Significance, and Regionally Significant Ecological Areas. These public data layers can be accessed online from to the MN Geospatial Commons at <https://gisdata.mn.gov/>.

Based on the current NHIS letter for a portion of the project area, there are state-listed threatened and endangered species in the vicinity of the project and **avoidance measures will be required**. Please coordinate closely with DNR Regional Nongame Wildlife Specialist, Erica Hoaglund (Erica.Hoaglund@state.mn.us; 651-259-5772), during the design and construction phases to ensure that impacts to rare species are avoided.

2. There are multiple Public Water Wetlands in the project area. It appears that the project may need to cross one or more of these wetlands and could require a DNR Public Water Permit. I recommend contacting DNR Area Hydrologist, James Bedell (James.Bedell@state.mn.us; 320-223-7850), for questions regarding permit requirements.
3. For additional information regarding solar projects, please see [Commercial Solar Siting Guidance](#) and [Prairie Establishment & Maintenance Technical Guidance for Solar](#)

[Projects](#) documents.

Please let me know if you have any questions.

Thank you,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her

Minnesota Department of Natural Resources

1200 Warner Road

St. Paul, MN 55106

Phone: 651-259-5755

Email: melissa.collins@state.mn.us

mndnr.gov



From: William Risse <wrisse@nationalgridrenewables.com>

Sent: Friday, January 15, 2021 3:41 PM

To: Collins, Melissa (DNR) <Melissa.Collins@state.mn.us>

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>

Subject: RE: Sherco Solar- Notification of Proposed Project

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Hello Ms. Collins,

My apologies, I previously provided incorrect map information in my recent correspondence. Please find the attached updated letter regarding the proposed Sherco Solar Project, located in Sherburne County, Minnesota. The purpose of this letter is to inform your organization of the proposed Project, seek your input regarding any permits and approvals that may be required, and identify interests your organization may have in the Project site or associated study area. We welcome any comments your agency may have at this time and throughout the permit application process. Any written agency comments provided in response to this letter will be incorporated into the PUC's review process.

Regards,

William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: William Risse <wrisse@nationalgridrenewables.com>
Sent: Friday, January 15, 2021 3:12 PM
To: melissa.collins@state.mn.us
Cc: Melissa Schmit <melissa@nationalgridrenewables.com>
Subject: Sherco Solar- Notification of Proposed Project

Hello Ms. Collins,

Please find attached letter regarding the proposed Sherco Solar Project, located in Sherburne County, Minnesota. The purpose of this letter is to inform your organization of the proposed Project, seek your input regarding any permits and approvals that may be required, and identify interests your organization may have in the Project site or associated study area. We welcome any comments your agency may have at this time and throughout the permit application process. Any written agency comments provided in response to this letter will be incorporated into the PUC's review process.

Regards,
-William



William Risse
Permitting Specialist

P 952.300.9476

E wrisse@nationalgridrenewables.com

952.988.9000



8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

Agency Responses

Minnesota Department of Agriculture

Xcel Energy
Docket No. E-002/GS-21-191
Docket No. E-002/TL-21-190
Docket No. E-002/TL-21-189
April 2021

From: [William Risse](#)
To: ["Roos, Stephan \(MDA\)"](#)
Cc: [Melissa Schmit](#); [Rogers, Timothy G](#); [Heine, Ellen L](#)
Subject: RE: Sherco Solar- Notification of Proposed Project
Date: Thursday, April 8, 2021 11:20:00 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)

Hi Steve,

Just wanted to circle back and thank you for all of the feedback you provided us at the meeting we had earlier this week. We are moving forward with preparation of an AIMP, and plan to submit that with our site permit application in the coming weeks. Given our permit submittal timeline, it is unlikely that we will be able to pass the AIMP to you for review prior to our SPA submittal, but the plan will closely track other plans that NG Renewables has submitted to the PUC for other Projects.

We look forward to maintaining a dialogue as we move this Project forward.

Regards,
-William

From: Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Sent: Monday, April 5, 2021 2:49 PM
To: William Risse <wrisse@nationalgridrenewables.com>
Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Rogers, Timothy G <Timothy.G.Rogers@xcelenergy.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>
Subject: RE: Sherco Solar- Notification of Proposed Project

Hi William,

I'd be happy to talk with you and your team. My availability for this week is:

- Tuesday, April 6: anytime after 2:30pm
- Wednesday, April 7: anytime after 10am
- Thursday, April 8: anytime before 10am, anytime after 3pm
- Friday, April 9: open all day

I'm surprised that you didn't get a response from MDA although paper mail has been often delayed since we don't have staff routinely in the office and mail is not automatically forwarded. However, digital communication always gets through.

Let me know what works for your schedule. Also, I am able to connect to most of the common digital meeting platforms if that works better than a phone call.

Thanks,
Steve

Steve Roos, PLA, ASLA
Environmental Planner

Energy and Environment Section
Agricultural Marketing and Development Division
Minnesota Department of Agriculture
625 Robert Street North
Saint Paul, MN 55155-2538
Ph: 651-201-6631 office, 651-245-2392 cell



www.mda.state.mn.us

From: William Risse <wrisse@nationalgridrenewables.com>
Sent: Monday, April 5, 2021 2:01 PM
To: William Risse <wrisse@nationalgridrenewables.com>; Roos, Stephan (MDA) <stephan.roos@state.mn.us>
Cc: Melissa Schmit <melissa@nationalgridrenewables.com>; Rogers, Timothy G <Timothy.G.Rogers@xcelenergy.com>; Heine, Ellen L <ellen.l.heine@xcelenergy.com>
Subject: RE: Sherco Solar- Notification of Proposed Project

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Hello Steve,

I hope you are doing well. I am a colleague of Melissa's here at NG Renewables (formerly Geronimo) and we are working toward submittal of the Sherco Solar Project in coordination with Xcel Energy. We never received a response from MDA after sending our notification letter and were hoping to set some time aside for an introductory call to discuss the Project with you. Specifically, we are interested in your perspective regarding Vegetation Management Plans and Agricultural Impact Mitigation Plans as well as our perspective regarding the preparation of those items.

Would you have availability any time over the next several days for a call? If you can propose a few times, we would be more than willing to accommodate your schedule.

Thank you,
-William



952.988.9000



William Risse
Permitting Specialist

P 952.300.9476

E wrisse@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

From: William Risse <wrisse@nationalgridrenewables.com>

Sent: Friday, January 15, 2021 3:38 PM

To: stephan.roos@state.mn.us

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>

Subject: RE: Sherco Solar- Notification of Proposed Project

Hello Mr Roos,

My apologies, I previously provided incorrect map information in my recent correspondence. Please find the attached updated letter regarding the proposed Sherco Solar Project, located in Sherburne County, Minnesota. The purpose of this letter is to inform your organization of the proposed Project, seek your input regarding any permits and approvals that may be required, and identify interests your organization may have in the Project site or associated study area. We welcome any comments your agency may have at this time and throughout the permit application process. Any written agency comments provided in response to this letter will be incorporated into the PUC's review process.

Regards,
William



952.988.9000



William Risse
Permitting Specialist

P 952.300.9476

From: William Risse <wrisse@nationalgridrenewables.com>

Sent: Friday, January 15, 2021 3:08 PM

To: stephan.roos@state.mn.us

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>

Subject: Sherco Solar- Notification of Proposed Project

Hello Mr. Roos,

Please find attached letter regarding the proposed Sherco Solar Project, located in Sherburne County, Minnesota. The purpose of this letter is to inform your organization of the proposed Project, seek your input regarding any permits and approvals that may be required, and identify interests your organization may have in the Project site or associated study area. We welcome any comments your agency may have at this time and throughout the permit application process. Any written agency comments provided in response to this letter will be incorporated into the PUC's review process.

Regards,

-William



952.988.9000



William Risse

Permitting Specialist

P 952.300.9476

E wrisse@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

Agency Responses

Minnesota Department of Transportation

Xcel Energy
Docket No. E-002/GS-21-191
Docket No. E-002/TL-21-190
Docket No. E-002/TL-21-189
April 2021

From: [Kotch Egstad, Stacy \(DOT\)](#)
To: [William Risse](#)
Cc: [Melissa Schmit](#); [Renn, Mark \(DOT\)](#)
Subject: [External] RE: Sherco Solar- Notification of Proposed Project
Date: Tuesday, January 26, 2021 12:13:28 PM
Attachments: [image002.png](#)
[image004.png](#)
[image006.png](#)
[image008.png](#)
[image013.png](#)
[image015.png](#)
[image017.png](#)
[image019.png](#)
[image025.png](#)

Good Afternoon William,

Early review of the above-mentioned solar project shows the following comments/concerns:

1. Access for the project will need to be from county and township roads as no new access will be allowed from US 10
2. No new Drainage Permit applications on our trunk highway system will be accepted
3. If utilizing any existing accesses from US 10, MnDOT permits will be needed as this is a change of use, even if temporary, from the existing access
4. MnDOT's Office of Environmental Stewardship will need to review applicable permit applications due to any presence of sensitive vegetation, contamination, cultural resources, or protected wildlife within the project area/MnDOT property
5. Permit applications and instructions are located here:
<http://www.dot.state.mn.us/utility/index.html> - keeping in mind that you may need more than one type of permit from MnDOT including possible Rail Bank Accommodation
6. MnDOT views solar generating projects as it would any other private commercial venture and does not consider a solar generating project to be a public utility for transportation purposes and therefore, any MnDOT land that these projects may wish to occupy would need to be leased (in the areas where a lease is feasible)
7. Any associated electric cable/feeder lines that run **along** a trunk highway right of way would need to be permitted through a municipal, cooperative or investor-owned electric service provider
8. Crossings are permitted without utilizing the above-mentioned providers

Early permit coordination is recommended and should be done through Mark Renn, MnDOT District 3B Roadway Regulations Supervisor at Mark.Renn@state.mn.us or work 320-223-6522/cell 320-293-8513/toll free 1-800-657-3961.

Thank you for the opportunity to provide early feedback on this project. Please contact me with any questions.

Stacy Kotch Egstad

Utility Routing and Siting Coordinator
Minnesota Department of Transportation
Office of Land Management

stacy.kotch@state.mn.us

MnDOT



From: William Risse <wrisse@nationalgridrenewables.com>

Sent: Friday, January 15, 2021 3:43 PM

To: Kotch Egstad, Stacy (DOT) <stacy.kotch@state.mn.us>

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>

Subject: RE: Sherco Solar- Notification of Proposed Project

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Hello Ms. Kotch Egstad,

My apologies, I previously provided incorrect map information in my recent correspondence. Please find the attached updated letter regarding the proposed Sherco Solar Project, located in Sherburne County, Minnesota. The purpose of this letter is to inform your organization of the proposed Project, seek your input regarding any permits and approvals that may be required, and identify interests your organization may have in the Project site or associated study area. We welcome any comments your agency may have at this time and throughout the permit application process. Any written agency comments provided in response to this letter will be incorporated into the PUC's review process.

Regards,
William



William Risse
Permitting Specialist

P 952.300.9476

952.988.9000



From: William Risse <wrisse@nationalgridrenewables.com>

Sent: Friday, January 15, 2021 3:15 PM

To: stacy.kotch@state.mn.us

Cc: Melissa Schmit <melissa@nationalgridrenewables.com>

Subject: Sherco Solar- Notification of Proposed Project

Hello Ms. Kotch Egstad,

Please find attached letter regarding the proposed Sherco Solar Project, located in Sherburne County, Minnesota. The purpose of this letter is to inform your organization of the proposed Project, seek your input regarding any permits and approvals that may be required, and identify interests your organization may have in the Project site or associated study area. We welcome any comments your agency may have at this time and throughout the permit application process. Any written agency comments provided in response to this letter will be incorporated into the PUC's review process.

Regards,
-William



952.988.9000



William Risse

Permitting Specialist

P 952.300.9476

E wrisse@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

Agency Responses

Minnesota Pollution Control Agency

Xcel Energy
Docket No. E-002/GS-21-191
Docket No. E-002/TL-21-190
Docket No. E-002/TL-21-189
April 2021

From: [Adams, Samantha \(MPCA\)](#)
To: [William Risse](#)
Subject: [External] Industrial Stormwater
Date: Tuesday, January 19, 2021 1:36:26 PM
Attachments: [MPCA Brainerd Notification Letter Sherco Solar.pdf](#)

Mr. Risse,

This information was forwarded to me and I would just advise that you check your Standard Industrial Classification and determine if this is a SIC code that requires an Industrial Stormwater Permit. Please see our webpage for more detail at: <https://www.pca.state.mn.us/water/step-1-applicability-do-you-need-permit>

Thank You

Samantha

Samantha Adams

State Program Administrator Principal

Industrial Stormwater

Brainerd Office

Industrial Division

218-316-3892

218-820-4915

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From: [Brixius, Aaron P](#)
To: [Bluhm, Steven L](#); [Castillo, Manuel D](#); [Notch, Patrick S](#); [Hunt, John](#); [Berrington, Jeff J](#); [Dawson-Olson, Olivia I](#)
Cc: [Tuttle, Toby](#); [Schindler, Kathleen D](#)
Subject: RE: Sherco Solar- Notification of Proposed Project
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Steve,

Correct, for permit outreach at this stage a wider area is applied to the transmission centerline to allow for design changes without re-permitting. There would be no impact to the ponds (capped or active). Our future demolition landfill has also been considered in the route.

Please send any other questions to Toby , Kate and I and we can address.

Thanks,

Aaron Brixius, PE

Xcel Energy | Responsible By Nature

Sr. Project Manager, Energy Supply Projects

414 Nicollet Mall, 414-2 Minneapolis, MN 55401

Desk: 612.330.5794

13999 Industrial Blvd Becker, MN 55308

Desk: 763.261.3802

Cell: 701.799.1659

E: aaron.p.brixius@xcelenergy.com

From: Bluhm, Steven L <steven.l.bluhm@xcelenergy.com>

Sent: Wednesday, January 27, 2021 11:42 AM

To: Castillo, Manuel D <Manuel.D.Castillo@xcelenergy.com>

Cc: Hunt, John <John.Hunt@xcelenergy.com>; Berrington, Jeff J <jeff.j.berrington@xcelenergy.com>; Dawson-Olson, Olivia I <Olivia.I.Dawson-Olson@xcelenergy.com>; Tuttle, Toby <Toby.W.Tuttle@xcelenergy.com>; Brixius, Aaron P <Aaron.P.Brixius@xcelenergy.com>; Notch, Patrick S <Patrick.S.Notch@xcelenergy.com>

Subject: FW: Sherco Solar- Notification of Proposed Project

Manny,

I have not heard of any details on the Transmission line routing. But I assume this map is drawn with a board brush, to show a concept of where the transmission lines would be routed. And that the corridor width would not necessarily need to be as wide as shown. I would assume the transmission lines would not impact the Landfill, (or the Ponds) because there should be enough room adjacent to the East side of the Landfill. This would avoid the extra permitting and construction costs required to place the towers over the Landfill Cap. We already have currently have Transmission lines running in the blue shaded corridor located East of the road on the East side of the Landfill. I would reach out to Toby Tuttle or Aaron Brixius to confirm, and find out who we want to answer these

Agency Responses

Minnesota Board of Water and Soil Resources

Xcel Energy
Docket No. E-002/GS-21-191
Docket No. E-002/TL-21-190
Docket No. E-002/TL-21-189
April 2021

From: [William Risse](#)
To: ["Shaw, Dan B \(BWSR\)"](#)
Cc: [Erdmann, Paul \(BWSR\)](#); [Heine, Ellen L](#); [Rogers, Timothy G](#)
Subject: RE: Sherco Solar- Vegetation Management Plan- Seeking Agency Comment
Date: Monday, April 12, 2021 8:33:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi Dan,

Thanks for the reply. We are planning to submit our Site Permit Application, including the Vegetation Management Plan to the PUC at the end of this week. I recognize that you likely will not have completed your review at that time, but we hope that we can receive your comments in the next couple of weeks. As we state in the plan, it is a living document that we will continue to update as we obtain more information, so our PUC filing is certainly not an end-all for the effort.

As you can see in the draft scorecard included along with the VMP, we hope to work toward a “gold-standard” certification for the site. We have built in some redundancy in the plan that allows for flexibility in obtaining the gold standard. For example, if forbs species do not establish quite as we hope, a lower point assignment in that category would not be consequential to our gold-standard rating.

We appreciate your consideration,
-William

From: Shaw, Dan B (BWSR) <dan.shaw@state.mn.us>
Sent: Monday, April 12, 2021 7:58 AM
To: William Risse <wrisse@nationalgridrenewables.com>
Cc: Erdmann, Paul (BWSR) <paul.erdmann@state.mn.us>
Subject: RE: Sherco Solar- Vegetation Management Plan- Seeking Agency Comment

William,

It is good to connect with you and to hear about your interest in meeting the Habitat Friendly Solar standard for the Sherco project. We can definitely provide additional review of the project. Please let me know your timeline and if there is a specific deadline for the comments.

Thanks, Dan

Dan Shaw
Senior Ecologist/Vegetation Specialist
Minnesota Board of Water and Soil Resources
612-236-6291


From: William Risse <wrisse@nationalgridrenewables.com>
Sent: Thursday, April 8, 2021 10:40 AM
To: Shaw, Dan B (BWSR) <dan.shaw@state.mn.us>

Cc: Heine, Ellen L <ellen.l.heine@xcelenergy.com>; 'Rogers, Timothy G' <timothy.g.rogers@xcelenergy.com>; Melissa Schmit <melissa@nationalgridrenewables.com>
Subject: Sherco Solar- Vegetation Management Plan- Seeking Agency Comment

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Hello Dan,

My colleague Melissa Schmit at National Grid Renewables (formerly Geronimo Energy) passed me your information. It is nice to meet you! Xcel Energy, with support from NG Renewables is seeking feedback from agencies regarding our Sherco Solar Project, a 460 MW Solar Energy Project proposed in Sherburne County, Minnesota. You can find our VMP  [at this link](#).

We have received feedback from MDA and the DNR regarding vegetation management for the site, and were hoping to engage with you as well regarding any comments you may have on our plan. We hope to continue to refine this plan as we move toward construction, and we have established a goal for the Project of meeting the “gold standard” of BWSR’s MN Habitat Friendly Solar Program. We would welcome any preliminary feedback that BWSR has regarding our plans. Don’t hesitate to reach out with any questions.

Thank you,
-William



952.988.9000



William Risse
Permitting Specialist

P 952.300.9476

E wrisse@nationalgridrenewables.com

8400 Normandale Lake Boulevard, Suite 1200 | Bloomington, MN 55437

Agency Responses

City of Clear Lake