

Harmony Solar ND, LLC
Harmony Solar Project
Docket No. PU-18-219

Late-Filed Exhibit No. 13 – Quality Assurance on Seed from ND Seed Department

Harmony Solar ND, LLC (“Harmony Solar”), called the North Dakota Seed Commission regarding “certified vendors” for seed mixes. The North Dakota Seed Commission stated that they do not keep a list of certified vendors for seed mixes; rather, they only keep a list of certified vendors for agricultural crop seeds. The North Dakota Seed Commission referred Harmony Solar to Agazzi Seeding, a seed provider discussed below.

Harmony Solar then spoke with two reputable prairie restoration mix seed dealers that conduct business in North Dakota: Prairie Restorations in Moorhead, Minnesota; and Agazzi Seeding in Fargo, North Dakota. Both companies confirmed North Dakota does not have a certification process in place for the types of mixes to be used for the Harmony Solar Project (“Project”). Instead they ensure seed quality by testing each species going into a mix through an independent lab that has been certified by the Association of Official Seed Certifying Agencies (“AOSCA”).¹ The lab will provide seed tags, which are the industry standard for native seed sales.² The tag provides information about the seed, including the geographic origin, the percentage of Pure Live Seed (“PLS”), and germination/viability percentage. In addition to the tags provided on the mixes, Harmony Solar will request copies of the lab testing results from the seed suppliers. This approach aligns with the procedure set forth in Section 2.4 of the Vegetation Management Plan.

Both the North Dakota Department of Agriculture and the Cass County Board of County Commissioners raised concerns regarding Palmer amaranth (*see* Late-Filed Exhibit No. 11 and attached November 7, 2018 letter from Cass County). As noted above, in addition to obtaining AOSCA-certified seed mixes from reputable seed mix dealers, Harmony Solar will obtain copies of the lab testing results from the seed suppliers in order to confirm the absence of Palmer amaranth from the seed mixes to be used for the Project.

¹ See: <https://www.aosca.org/>.

² See: https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs144p2_010411.pdf.



November 7, 2018

County Administrator

Robert Wilson
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North Dakota Public Service Commission
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0480

Re: Cass County Follow-Up Information: Harmony Solar

North Dakota Public Service Commission:

On Thursday, November 1st the North Dakota Public Service Commission (PSC) held a Public Hearing in Casselton to receive input about the proposed Harmony Solar project. I testified on behalf of Cass County and verbally expressed support for the project. The County previously submitted a letter of support as part of the initial permit application.

I was asked during my testimony if Cass County Commissioners are aware of the seed mixes that will be used on the site. I indicated I was not aware of conversations about the mixes, but I would check with Cass County Weed Control Officer, Mr. Stanley Wolf, share his feedback with the Commission and follow up with the PSC.

Mr. Wolf made the following statement, which the Commission asked me to provide as Cass County's position:

"Upon reviewing the Vegetation Management Plan for the Harmony Solar Project, it appears that the plan is appropriate for the location. My only addition to the plan is to have the seed sourced or produced from areas that do not have Palmer amaranth. Palmer amaranth is a very invasive non-native weed and is being considered to be added to the North Dakota Noxious Weed List. Due to its aggressive growth and prolific seed production, if Palmer amaranth is identified on the site a zero-tolerance weed management policy needs to be adopted with frequent scouting to identify and remove any Palmer amaranth plants prior to seed formation."

Please contact me if you need additional information.

Sincerely,

Robert Wilson
Cass County Administrator

Box 2806
211 Ninth Street South
Fargo, North Dakota 58103

cc: Melissa Schmit, Geronimo Energy
Jay L. Hesse, Geronimo Energy