

August 19, 2025

Consumer Affairs Office

Minnesota Public Utilities Commission

Re: PUC Docket No. IP7115/GS-23-423 and OAH Docket No. 25-2500-40508

121 7th Place E, Suite 350

Saint Paul, MN 55101-2147

NextEra Energy Resources

Re: Benton Solar, Benton County, Minnesota

700 Universe Blvd.

Juno Beach, FL 33408

RE: Screening Concerns Related to the Benton Solar Project Near R. Mitchel Court NE

Dear Commissioners,

When reviewing projects that require an Interim Use Permit (IUP), such as solar energy systems, it is imperative that the Planning Commission consider not only compliance with applicable use standards, but also whether the proposed development is appropriately buffered from nearby residential uses. Adequate screening must be provided to ensure that adjacent properties do not experience depreciation in value or diminished development potential. In certain cases, the Commission may determine that the minimum screening requirements are inadequate to protect the residential character and property interests of nearby communities.

NextEra Energy / Benton Solar recently presented the Benton County Planning Commission the proposed site screening for the Benton Solar Project, paying particular attention to areas within 1,000 feet of residential dwellings. While the proposed vegetative screening—consisting of two staggered rows of evergreen trees planted no more than eight feet apart—may meet the minimum requirements set forth in Benton County Development Code Section 9.20.2(G), we believe it is insufficient to effectively mitigate the visual impact in at least one key area of the project.

NextEra's screening proposal is one of several options allowed under the Benton County Development Code, which is intentionally flexible to allow for the most appropriate solution to visual buffering. While we agree that enhanced screening is not necessary for all portions of the project, the area adjacent to R. Mitchel Court Northeast (west of 75th Avenue NE / County Road 25) warrants special consideration. This section of the project is adjacent to a higher concentration of residential homes and has the character of a rural neighborhood rather than expansive agricultural tracts.

Further complicating this issue are the soil conditions in this area. Soil surveys and testimony from local residents confirm that the dominant soils—Hubbard Loamy Sand and Verndale Sandy Loam—are poorly suited to support the establishment and long-term survival of vegetation, particularly more mature trees that require substantial and consistent moisture. These conditions pose a serious challenge to the viability of the proposed screening.

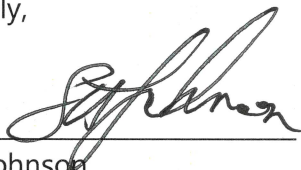
Given these site-specific limitations, we respectfully recommend the use of an earthen berm approximately six feet in height, modeled after the screening implemented at a nearby solar installation located at 3388 County Road 8 SE, St. Cloud, MN 56304. That project, located in Sherburne County, shares similar—if not identical—soil conditions and demonstrates a successful precedent for enhanced screening in a comparable setting.

While empirical studies may suggest that utility-scale solar projects do not reduce nearby property values, such research often fails to capture the full impact on community character. The conversion of land from agricultural or rural residential use to an industrial-scale energy facility significantly alters the visual and aesthetic environment. In other jurisdictions, projects of this scale would often be limited to industrial zones—something not always feasible in more rural areas due to land availability.

For these reasons, we respectfully urge NextEra Energy / Benton Solar and the Public Utilities Commission to consider enhanced screening measures—such as the proposed earthen berm—in this particular location. Doing so would not only help preserve the visual and community character of the area, but also better reflect the intent and spirit of the Benton County Development Code.

Thank you for your consideration.

Sincerely,



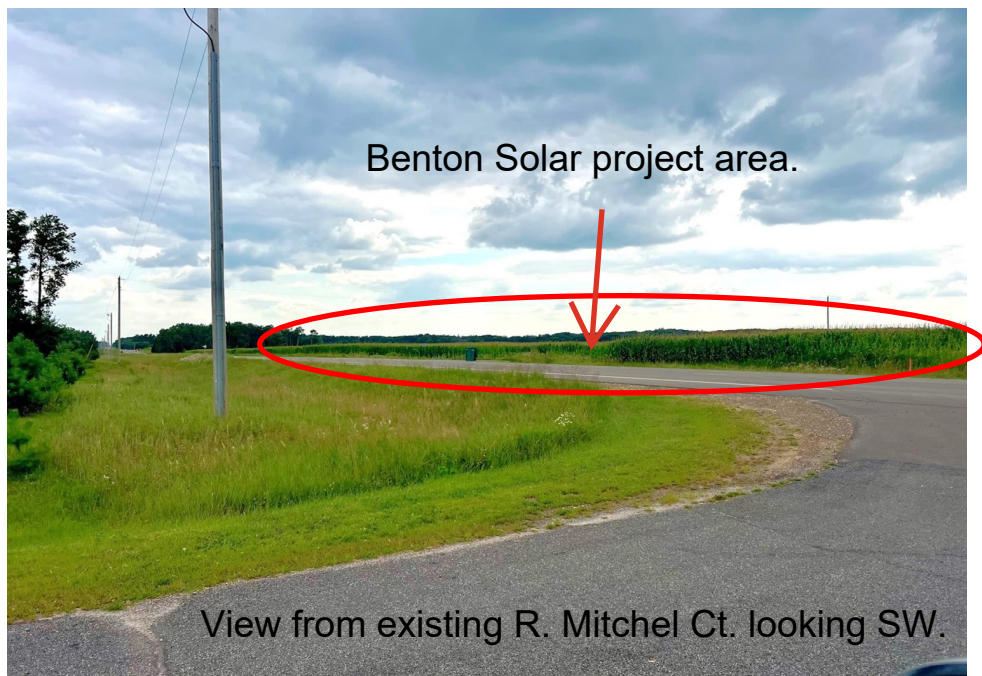
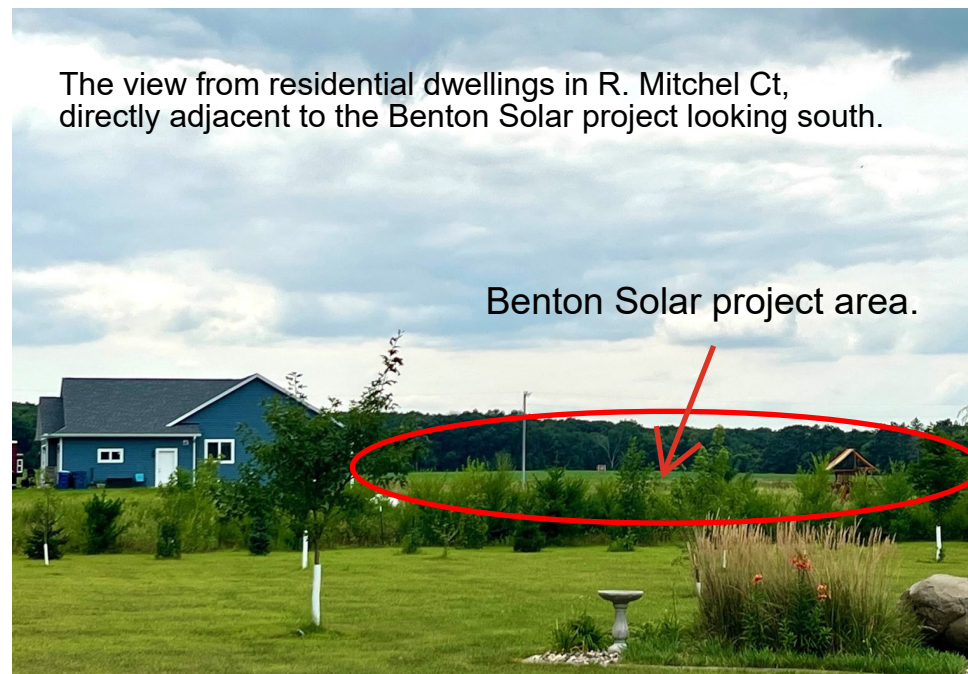
Scott Johnson
Chair, Benton County Planning
Commission



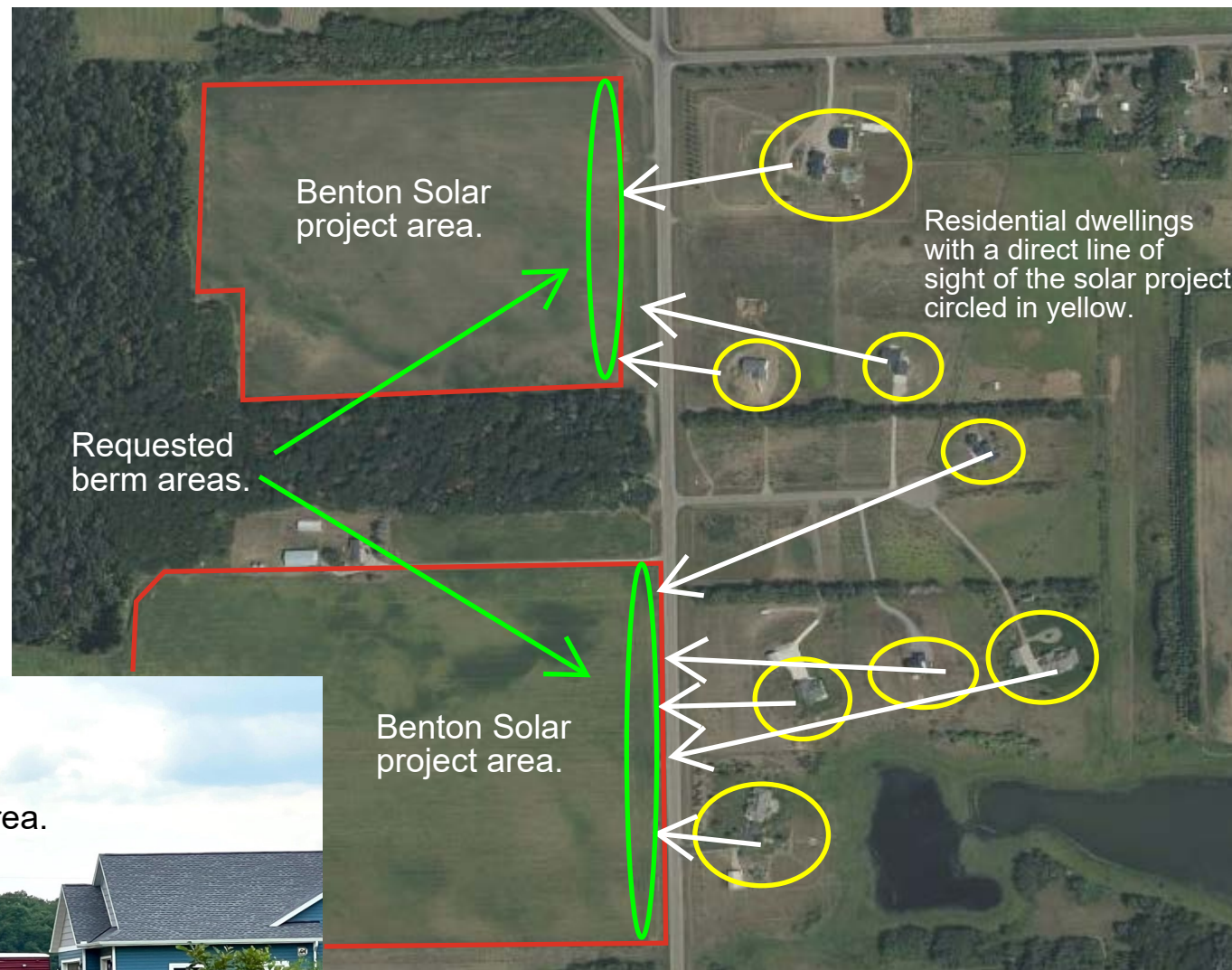
Edward D. Popp
Chair, Benton County Board of
Commissioners

Enclosures:

- Exhibit A: Photos of the R. Mitchel Ct area.
- Exhibit B: Aerial photo of the solar site at 3388 County Road 8 SE, St. Cloud, MN 56304
- Exhibit C: Photos of the screening berm at 3388 County Road 8 SE, St. Cloud, MN 56304



Benton Solar project area adjacent to R. Mitchel Ct.



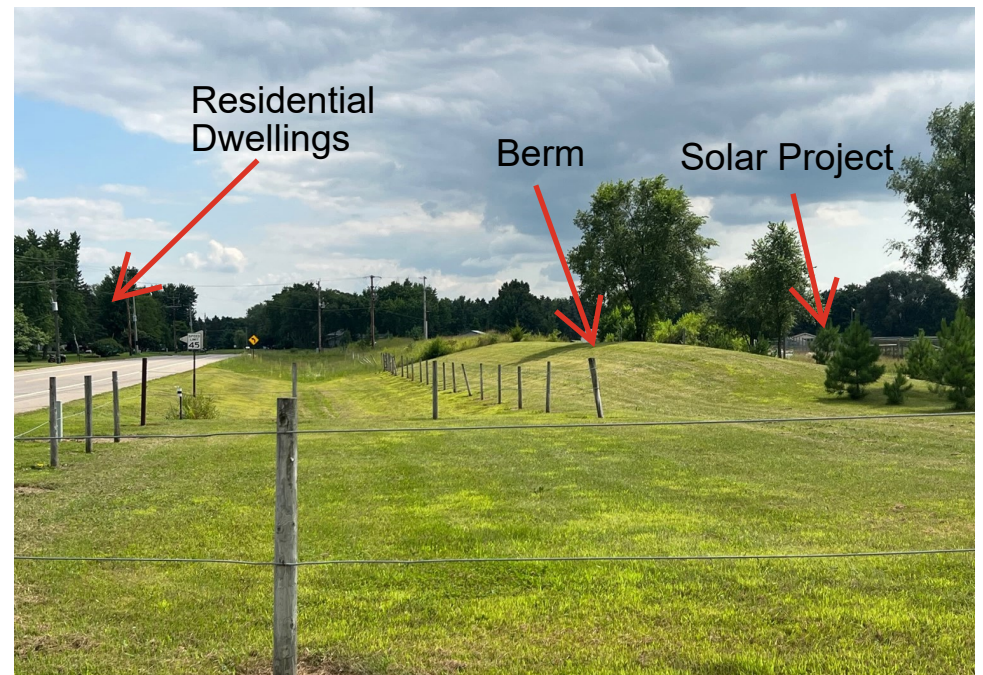


Aerial photo from Google Earth showing the solar project at 3388 County Road 8 SE, St. Cloud, MN 56304. The project includes an earthen berm adjacent to County Road 8 SE, which effectively screens the view of the solar project for residents east of the project.



Photos of berm at 3388 County Road 8 SE, St. Cloud, MN 56304

Exhibit C



Photos of earthen berm at 3388 County Road 8 SE, St. Cloud, MN 56304

