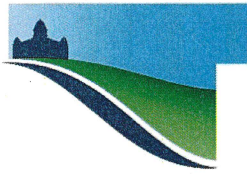


Written Public Comments Received on the
Scope of the Environmental Assessment for the
Gopher State Solar Project
Docket No. GS-24-106

Public Comments

1. Renville County



**In the Matter of Application of Gopher State Solar, LLC for a Site Permit for the up to 200 MW
Gopher Solar Project in Renville County, MN**

Docket No. IP7127/GS-24-106

November 1, 2024

To Whom it May Concern:

Thank you for the opportunity to submit comments on this matter. Renville County has reviewed the application submitted by Gopher State Solar, and have the following comments to be considered.

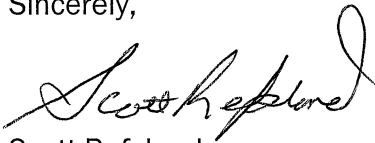
1. Renville County appreciates Gopher State Solar LLC taking the county required setbacks under consideration. According to the application, they will not be meeting our 20-foot side and rear property line setbacks, they are proposing a 0-foot setback or the required 40-foot setback from the center of a county tile line as they are proposing a 38-foot setback. If fences are placed on the property line, we are concerned they will be damaged by farm equipment. The setback from county tile lines is needed to ensure solar panels and fences will not need to be removed to repair tile lines if needed. The county respectfully requests all Renville County setbacks are followed and required language in the final permit.
2. Tile lines are an important part of agriculture in Renville County. It can sometimes take some time before there is known damage to tile lines. Renville County respectfully requests that Gopher State Solar be responsible to repair any damaged tile lines, public or private for the life of the project if it can be determined that the solar project is the cause of the damage.
3. Renville County does not feel \$1,440,317.00 is a sufficient amount of money to decommission a 200 MW solar system. Renville County currently requires \$200,000.00 bond for a 1MW solar system. If the project would become the responsibility of the county to decommission it would cost approximately \$20,681,320.00 just to recycle the panels based on today's costs. Renville County obtains a cost every year from CleanLites Recycling on what it would cost per pound to recycle solar panels. The cost for 2024 is \$.95 per pound. The project is proposing there to be 448,862 panels at 48.5 pounds/panel times \$.95/ pound equals \$20,681,316.65. This does not include any other disposal costs and site restoration. Renville County respectfully request the financial assurance be a

minimum of \$21,000,000.00, and the financial assurance starts at year one and reviewed every five years and update as needed and a copy of the financial assurance be submitted to Renville County once it is issued.

4. The Operations and Maintenance Plan does not specially address weed control. It normally takes 3-4 years for the native grass to become established and suppress the weeds. Renville County respectfully request that language be added to the permit that the site will be kept clean and weed free.
5. Renville County respectfully request to be notified when/if there is an ownership change and be provided the new contact information.
6. Renville County respectfully request that a Road Use and Development Agreement be entered between Gopher State Solar and Renville County and affected Townships.
7. Renville County respectfully request the Gopher State Solar work/train with local emergency response teams, that may have to enter the site, so they can perform their duties safely if the need ever arises.
8. The Renville County Renewable Energy Ordinance requires a screening barrier of trees to be planted between the solar project and residences. Renville County respectfully request that Gopher State Solar provide screening by planting and maintaining two rows of staggered evergreen trees along road ways and in front of non-participating residences planted 20 feet on center or as recommended for the specific tree variety. All trees must be a minimum of four feet tall measured from the top of the root ball to the top of the tree at the time of planting. Trees shall be planted within 30 days of completion of the solar project. The owner/operator is responsible to replace any trees that die or fail to serve the purpose of screening. All required tree setbacks must be followed.

Again, thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Refsland", written in a cursive style.

Scott Refsland
Environmental Services Director