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Senate

State of Minnesota

August 4, 2025

Subject: Expedited Permitting for the Lemon Hill Solar Project in Viola and Haverhill Townships (Docket number 25-126)

To the Members of the Minnesota Public Utilities Commission,

We are writing to respectfully urge the Commission not to grant Lemon Hill Solar, LLC expedited permitting for its proposed 180 MW solar facility in Viola and Haverhill Townships, Olmsted County.

We are especially concerned due to recent changes in federal law passed by Congress and the Trump administration, which are phasing out certain tax credits and incentives that may apply to Lemon Hill, LLC, and their developer, Ranger Power. Trying to beat the deadline may be compelling them to request expedited permitting for the project to benefit their financial interests. Their hurry should not interfere with the due diligence of the Commission to regulate in the best interests of the residents of the two townships, the Southeastern Minnesota region, and the State of Minnesota.

There are several compelling reasons to proceed with caution and conduct a thorough review, including citizen input, rather than limiting it by accelerating the process:

1. Community Impact

- The Lemon Hill Solar project would cover approximately 1,800 acres across rural Viola and Haverhill Townships, a significant transformation of the local landscape.
- Residents of the affected area and their representatives have raised concerns about the loss of community input. We are aware of at least 100 residents who have

expressed concerns about the project, and many of them attended a locally organized town hall meeting that we attended back in May of this year in the area. As of today, we are told that there may be as many as 20 citizens, many of whom are elderly with limited computer skills, who still wish to provide input during the initial comment period. Expediting the permitting process will limit meaningful public engagement and rob local stakeholders of adequate opportunity to participate, comment, and improve the outcomes for all concerned.

2. Environmental Review and Land Use

- Projects of this scale—exceeding 50MW—trigger state-level review because of their substantial environmental and land use impacts.
- The new permitting framework (effective July 1, 2025) consolidates and speeds up review for renewable energy. However, the Standard Review process still requires a comprehensive environmental assessment (EA), with a minimum six-month timeline to ensure all impacts are accounted for.
- This shift in the process means that local government will rely entirely on the due diligence of the PUC to vet local health and safety concerns with large-scale projects.
- In this case, an expedited process could result in insufficient assessment of unique local environmental, agricultural, and water management factors, including stormwater compliance and potential impacts on native plant communities and wildlife. The proposed development is in a very environmentally sensitive area. This process will benefit considerably from thorough input provided by the local people who know the most about the unique and numerous environmental concerns that this development proposal poses.

3. Pre-Application and Government Consultation Requirements

- The Permitting Act requires applicants to consult with federal, state, local, and Tribal governments prior to filing an application. Lemon Hill Solar LLC, through its representatives, has taken steps to communicate with some of these entities, but we are hearing from constituents that communication with the Townships has been inadequate to date.
- Allowing Lemon Hill Solar LLC to rush this process increases the risk of overlooking important jurisdictional issues and local concerns, which the PUC is responsible for ensuring are addressed in the permitting process. **MN Rules 7850.2400 gives the Commission the authority to appoint a citizen advisory task force at its discretion during the permitting process. We strongly urge you to do so.**

4. Precedent and Equity

- Granting expedited permitting in this case could set a precedent that would jeopardize the integrity of the permitting system, potentially encouraging other large-scale projects to seek similar treatment without adequate scrutiny.
- This could erode public trust and raise questions about fairness and equal application of state regulations.

The transformation of 1,800 acres of farmland and rural landscape into a solar facility deserves full and careful oversight. By denying expedited permitting, the Commission will safeguard local interests, preserve rigorous environmental and community review, and uphold a fair and transparent process.

Thank you for your careful consideration of these concerns.

Sincerely,



Steve Drazkowski
State Senator
District 20
Wabasha, Goodhue, Winona, Olmsted, and Dakota counties.



Steven Jacob
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