

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

MPUC Docket No. IP-7119/GS-24-106

OAH Docket No. 24-2500-40416

**DIRECT TESTIMONY OF SERGIO TREVINO
ON BEHALF OF GOPHER STATE SOLAR, LLC**

March 19, 2025

1 I. INTRODUCTION AND QUALIFICATIONS

2
3 **Q. Please state your name, employer, and business address.**

4 A. My name is Sergio Trevino. I am the Vice President of Siting at Ranger Power. My
5 business address is 320 N Sangamon Street, Suite 1025 Chicago, IL 60607.
6

7 **Q. Please briefly describe your educational background and professional**
8 **experience.**

9 A. I have approximately 15 years of renewable energy development experience,
10 including successful development of early-, mid-, and late-stage renewable energy
11 projects across the country. I have participated in the development of over 2 GW
12 of renewable energy projects currently in operation or under construction
13 nationwide. I have significant experience managing federal, state, and local
14 permitting processes in multiple states.
15

16 **Q. For whom are you testifying?**

17 A. I am testifying on behalf of Gopher State Solar, LLC (Gopher State Solar), an
18 independent power producer and an affiliate of D.E. Shaw Renewable
19 Investments, LLC (DESRI), in support of its Application for a Site Permit for the
20 Gopher State Solar Project (Project). The Project is an up to 200 megawatt (MW)
21 solar energy generating facility, a generation interconnect (gen-tie) line and
22 associated infrastructure in Kingman, Osceola, and Bird Island Townships in
23 Renville County, Minnesota.¹
24

25 **Q. What is your role with respect to the Project?**

26 A. My role is to assist with project development for the Project. My duties include
27 landowner and community engagement, overseeing environmental and
28 engineering site surveys, permitting, project marketing, and managing the design

¹ Gopher State Solar Site Permit Application (Aug. 19, 2024) (eDocket No. [20248-209582-02](#)) (hereafter referred to as “Application”).

1 of the Project. I am responsible for planning and coordinating Ranger Power's
2 permitting to ensure each project is supported by local and community
3 stakeholders while complying with all local, state, and federal guidelines.
4

5 II. PURPOSE OF TESTIMONY 6

7 Q. What is the purpose of your Direct Testimony?

8 A. The purpose of my testimony is to: (1) provide an overview of the Project; (2)
9 provide updates on the Project; (3) discuss the Project's anticipated
10 socioeconomic benefits and Gopher State Solar's coordination with Laborers'
11 District Council of Minnesota and North Dakota (LIUNA); (4) provide updates on
12 agency consultation and tribal coordination; and (5) describe Gopher State Solar's
13 responses to recommendations made by Renville County during the scoping
14 period.
15

16 Q. What schedules are attached to your Direct Testimony?

17 A. The following schedules are attached to my Direct Testimony:

- 18 • **SCHEDULE A**: Statement of Qualifications
- 19 • **SCHEDULE B**: Shakopee Mdewakanton Sioux Community Consultation
- 20 • **SCHEDULE C**: SHPO Project Review
- 21 • **SCHEDULE D**: Renville County SWCD Correspondence
- 22 • **SCHEDULE E**: Lower Sioux Community Consultation
- 23 • **SCHEDULE F**: Renville County Notice of On-site Environmental Studies
24

25 III. PROJECT OVERVIEW 26

27 Q. Please provide a summary of the Project, including the proposed location 28 and proposed site.

29 A. Gopher State Solar proposes to construct and operate a 200 MW photovoltaic (PV)
30 solar energy generating facility and associated infrastructure. The Project would
31 be located on approximately 977 acres within a 1,645-acre site in Kingman,

1 Osceola, and Bird Island townships in Renville County, Minnesota. The main
2 components of the Project would include PV solar modules and tracking system,
3 inverters, step-up transformers, collector lines, security fencing, access roads,
4 stormwater treatment areas, an operation and maintenance building, a substation,
5 transformers, and a new 1,300-1,500-foot overhead 230 kilovolt (kV) transmission
6 line that would connect the Project to the existing Great River Energy Panther
7 Substation.²

8
9 **Q. Please describe the generation interconnect (gen-tie) line associated with**
10 **the Project.**

11 A. The Project is adjacent to Great River Energy's existing 230 kV Panther
12 Substation, which will be the Project's Point of Interconnection (POI). Connecting
13 the Project to the POI will require an approximately 1,300-foot-long gen-tie line
14 between the proposed new Project substation and the Panther Substation. The
15 proposed gen-tie line will not exceed 1,500 feet in length.³

16
17 **Q. Why did Gopher State Solar choose the Project Area as presented in the**
18 **Application to build the Project?**

19 A. Gopher State Solar chose the Project Area following a rigorous analysis of three
20 key factors: the existing transmission grid in Minnesota, the suitability of available
21 land, and local landowner interest. This analysis includes a detailed evaluation of
22 topography, environmental attributes, land rights, proximity to the POI to the
23 electrical grid, and landowner interest. The Project Area was found to host strong
24 existing electrical transmission infrastructure and interested landowners, which
25 together eliminate the need for a long transmission line to interconnect the Project.
26 During the site selection process, Gopher State Solar determined that the
27 likelihood of impacts to wetlands and other sensitive resources would be very low.

² Application at 1.

³ Application at 6.

1
2 **IV. PROJECT UPDATES**
3

4 **Q. Have there been any updates to the Project since the Application was filed?**

5 A. Gopher State Solar continues to talk with area landowners to share information
6 about the Project and field questions from individuals interested in being a part of
7 the Project. However, there have been no updates to the Project boundary since
8 the Application was submitted.
9

10 **Q. What is the status of executing a generator interconnection agreement (GIA)**
11 **for the Project?**

12 A. The current schedule provided by MISO estimates that a GIA for Gopher State
13 Solar will be executed by January 1, 2026.
14

15 **Q. Has the anticipated schedule for the construction and in-service of the**
16 **Project changed from what was contemplated in the Application?**

17 A. Gopher State Solar's construction schedule is unchanged, but the in-service date
18 is now estimated to take place in Q4 of 2029 as opposed to the 2027 date in the
19 Application. The in-service date was delayed based on recent feedback from MISO
20 stating the transmission owner needs 51 months of lead time to upgrade the
21 substation into which Gopher State Solar will interconnect.
22

23 **V. LOCAL EMPLOYMENT & ECONOMIC BENEFITS**
24

25 **Q. Will the Project result in local employment and economic benefits?**

26 A. Yes. The Project is designed to be socioeconomically beneficial to the landowners
27 and those who reside near the Project Area, local governments, and communities.
28 Project construction will provide temporary revenue increases in the Project vicinity
29 through increased demand for lodging, food services, fuel, transportation, and
30 general supplies. The Project will also create new local job opportunities for various
31 trade professionals who live and work in the area, and it is typical to advertise

1 locally to fill required construction positions. Opportunity exists for sub-contracting
2 to local contractors for gravel, fill, and civil work. Additional personal income will
3 also be generated by circulation and recirculation of dollars paid out by the Project
4 as business expenditures and state and local taxes.⁴

5
6 Wages will be paid, and expenditures will be made to local businesses and
7 landowners during the Project's construction and operation. Easement agreement
8 payments and purchase option payments paid to the landowners will offset
9 potential financial losses associated with removing a portion of their land from
10 agricultural production.⁵

11
12 The Project will also result in an increase in local tax revenue. Zane Jones, the
13 assistant development manager at Ranger Power, stated at the public scoping and
14 information meetings for the Project in October 2024 that Gopher State Solar
15 would pay an estimated \$35 million in taxes over its 40-year life, 55 percent of
16 which would be directed to Renville County, 20 percent to the State, 15 percent to
17 townships, and 8 percent to local schools. Mr. Jones also stated that Gopher State
18 Solar is predicted to pay almost \$1 million in taxes in the first year.⁶ Based on an
19 updated estimated tax analysis, Gopher State Solar now estimates that the Project
20 would pay an estimated \$32 million in taxes over its 40-year life, 58 percent of
21 which would be directed to Renville County, 14 percent to the State, 14 percent to
22 townships, and 13 percent to local schools. The Project is expected to pay
23 approximately \$795,000 in taxes in the first year.

24
25 **Q. Has Gopher State Solar coordinated with representatives of the LIUNA?**

⁴ Application at 38-39.

⁵ Application at 39.

⁶ See Olivia 6:00 p.m. Public Scoping and Informational Meeting Transcript at 9:23-25; 10:1-4 (Oct. 29, 2024) and WebEx 1:00 p.m. Public Scoping and Informational Meeting Transcript at 9:9-15 (Oct. 28, 2024).

1 A. Yes. Gopher State Solar has met with representatives of LIUNA to discuss the
2 Project and the workforce that will be needed to construct the Project. Gopher
3 State Solar appreciates LIUNA's engagement and looks forward to the socio-
4 economic benefits that the Project will provide. Gopher State Solar plans to
5 continue to coordinate with additional skilled trades as it develops plans for
6 construction.

7
8 **Q. What are Gopher State Solar's commitments regarding the workforce that**
9 **will be needed for construction of the Project?**

10 A. Gopher State Solar will issue a request for proposal to contractors to construct the
11 Project. Gopher State Solar will include preferences for contractor bids that use
12 local construction craft employees to the greatest extent feasible in accordance
13 with the Project's budget, timeline, industry standards and requirements, and
14 corporate safety policies. Gopher State Solar will require the selected contractor
15 to work with labor unions, local subcontractors, or other vendors to implement a
16 project construction staffing model that attempts to maximize local hiring and local
17 economic benefits for the Project, while ensuring the Project is safely built on time
18 and on budget.⁷

19
20 **VI. COORDINATION WITH MINNESOTA STATE HISTORIC PRESERVATION**
21 **OFFICE (SHPO) & INTERESTED TRIBAL NATIONS**
22

23 **Q. Do you have any updates regarding SHPO coordination since the**
24 **Application was filed?**

25 A. On February 20, 2025, Gopher State Solar received a letter from the Minnesota
26 SHPO stating that they "have determined that no significant archaeological sites
27 will be affected by this project and that there are no properties listed in the National
28 or State Registers of Historic Places, or within the Historic Sites Network, that will

⁷ Application at 39.

1 be affected by this project.” A copy of this correspondence is included as
2 **Schedule C.**

3
4 **Q. Has Gopher State Solar received additional correspondence from interested**
5 **tribal nations?**

6 A. Yes. Gopher State Solar received an email in October 2024 from the Lower Sioux
7 Community Preservation Coordinator requesting that the Lower Sioux Community
8 be identified as an interested/consulting party. The Lower Sioux Community
9 commented that they were still finalizing the review for the Project but would reach
10 out to Gopher State Solar with comments and questions. This correspondence is
11 available in **Schedule E.**

12
13 Gopher State Solar will continue to provide updates to the Lower Sioux Community
14 as an interested tribal nation and looks forward to addressing any comments or
15 questions that the tribe may have throughout this permitting process.

16
17 Gopher State Solar also received an email from the Tribal Historic Preservation
18 Officer (THPO) of the Shakopee Mdewakanton Sioux Community on August 29,
19 2024, stating that the tribe would leave direct consultation to the Lower Sioux
20 Indian Community and any other federally-recognized Tribe with interest in the
21 Project. The Shakopee Mdewakanton Sioux Community stated that they would like
22 to be kept informed of the progress of the Project. This correspondence is available
23 in **Schedule B.**

24
25 Gopher State Solar will continue to keep the Shakopee Mdewakanton Sioux
26 Community informed as to the progress of the Project and will continue to consult
27 with the Lower Sioux Indian Community and any other Federally Recognized Tribe
28 with interest in the Project.

29
30 **VII. AGENCY CONSULTATION UPDATES**
31

1 **Q. Has Gopher State Solar conducted consultation with local agencies or**
2 **governments prior to submitting the Application that was not discussed in**
3 **Appendix G of the Application?**

4 A. Yes. Gopher State Solar coordinated with Renville County in May 2023 regarding
5 on-site environmental studies in Kingman, Osceola, and Bird Island Townships.
6 This correspondence is available in **Schedule F**.

7
8 **Q. Has Gopher State Solar conducted additional consultation with Renville**
9 **County's Soil and Water Conservation Division (SWCD) since the**
10 **Application was submitted?**

11 A. Yes. Following the filing of the Application, Gopher State Solar consulted with
12 SWCD regarding the Project's area of impact and whether large scale solar
13 structures are allowed on Reinvest in Minnesota (RIM) easements. This
14 correspondence is available in **Schedule D**.

15
16 **VIII. RESPONSE TO RENVILLE COUNTY COMMENTS**
17

18 **Q. Has Gopher State Solar received comments from Renville County**
19 **concerning the Project?**

20 A. Yes. The Minnesota Department of Commerce, Energy Environmental Review and
21 Analysis (EERA) unit filed scoping comments by Renville County's Environmental
22 Service Director, Scott Refsland on November 26, 2024, in the above referenced
23 docket.⁸ Renville County's written comments largely mirror oral comments made
24 by Mr. Refsland at the scoping meeting held on October 29, 2024.

25
26 **Q. Has Gopher State Solar had an opportunity to consider Renville County's**
27 **comments?**

⁸ See Written Comments on the Scope of the Environmental Assessment (EA) (Nov. 26, 2024) (eDocket No. 202411-212453-01).

1 A. Yes. On November 15, 2024, Gopher State Solar filed scoping comments
2 responding to the County's oral comments made at the scoping meeting. My
3 testimony provides additional response and updated coordination with the County
4 on the topics of decommissioning, financial assurance, and vegetative screening.
5

6 **Q. Has Gopher State Solar prepared a decommissioning plan for the Project?**

7 A. Yes. Gopher State Solar included a draft decommissioning plan in Appendix F of
8 the Application. Consistent with Department of Commerce guidance, the
9 decommissioning plan describes how the Project would be decommissioned at the
10 end of its useful life, provides a cost estimate for that decommissioning, and
11 describes financial assurance to ensure that funds are available for
12 decommissioning.⁹ A final Decommissioning Plan will be provided to the
13 Minnesota Public Utilities Commission (Commission) prior to Project construction.
14

15 **Q. Please summarize the comments Gopher State Solar has received from**
16 **Renville County regarding the decommissioning plan.**

17 A. In its scoping comments, Renville County expressed concern over the Gopher
18 State Solar's cost estimate for decommissioning the Project and the timing for
19 posting the financial assurance. Renville County requested \$21 million in financial
20 assurance beginning in year one of the Project.¹⁰ Renville County also expressed
21 concern over the estimated cost to recycle the Project's panels after the Project is
22 decommissioned.¹¹
23

24 **Q. Has Gopher State Solar had an opportunity to consult with Renville County**
25 **regarding their scoping comments?**

⁹ See *In the Matter of the Department of Commerce Working Group on Decommissioning of Wind and Solar Facilities*, MPUC Docket No. E-999/M-17-123, EERA Recommendations on Review of Solar and Wind Decommissioning Plans at 4 (March 16, 2020) (hereafter referred to as "EERA Decommissioning Plan Guidance").

¹⁰ Written Comments on the Scope of the EA at 3 (Nov. 26, 2024) (eDocket No. 202411-212453-01).

¹¹ Written Comments on the Scope of the EA at 2 (Nov. 26, 2024) (eDocket No. 202411-212453-01).

1 A. Yes. Gopher State Solar appreciates Renville County’s engagement regarding the
2 Project. Gopher State Solar had a call with Renville County staff on February 13,
3 2025, to discuss the County’s scoping comments. Gopher State Solar also met
4 with the Renville County Board of Commissioners during its work session on March
5 18, 2025, to discuss the County’s comments regarding decommissioning and
6 vegetative screening. Gopher State Solar looks forward to continuing to work with
7 Renville County as the permitting process for the Project progresses.

8
9 **Q. What is Gopher State Solar’s response to Renville County’s comments**
10 **regarding the decommissioning cost estimate?**

11 A. Gopher State Solar’s estimated decommissioning costs amount to approximately
12 \$7 million or \$35,000 per MW.¹² This estimate, consistent with applicable guidance
13 and other recent projects,¹³ was calculated using current pricing for removal of
14 components based on five years of degradation and depreciation of the solar
15 modules and will be re-evaluated every 5 years.¹⁴

16
17 In its scoping comments, Renville County estimated that it would cost
18 approximately \$20,681,320 to recycle the panels for the Project and thus
19 recommended a minimum of \$21 million in financial assurance.¹⁵ Gopher State
20 Solar believes that its estimated net decommissioning cost of \$1,440,317, after
21 accounting for salvage values, is more appropriate. Gopher State Solar would like
22 to clarify that it did not use the cost of recycling to calculate the estimated

¹² Application – Appendix F (Decommissioning Plan) at 6-1, 7-1 (Aug. 19, 2024) (eDocket No. [20248-209583-05](#)) (hereafter referred to as “Decommissioning Plan”).

¹³ See EERA Decommissioning Plan Guidance at 4 ; *In the Matter of the Application of Louise Solar Project, LLC for a Site Permit for the 50 MW Louise Solar Project in Mower County, Minnesota*, MPUC Docket No. IP-7039/GS-20-647, Compliance Filing - Decommissioning Plan at 7 (Oct. 21, 2024); see also *In the Matter of the Application of Byron Solar, LLC for a Certificate of Need, Site Permit, and Route Permit for the up to 200 MW Byron Solar Project and 345 kV Transmission Line in Dodge and Olmsted Counties, Minnesota*, MPUC Docket No. IP-7041/GS-20-763, Site Permit Application, Appendix H – Decommissioning Plan at 1-5 (Aug. 21, 2021).

¹⁴ Decommissioning Plan at 7-1.

¹⁵ Written Comments on the Scope of the EA at 2 (Nov. 26, 2024) (eDocket No. 202411-212453-01).

1 decommissioning costs for the Project as there are other potential avenues to
2 dispose of the panels.¹⁶ Many solar panels can be scrapped for the raw material
3 components inside of them.¹⁷ Additionally, solar panels still have power generating
4 capacity after their warranty expires, meaning they can be sold in a secondary
5 market at a steep discount. Gopher State Solar did not account for resale value in
6 its decommissioning plan, however, it would be estimated to cover the entire cost
7 of decommissioning.

8
9 **Q. What is Gopher State Solar's response to Renville County's comments**
10 **regarding financial assurance?**

11 A. As stated in the decommissioning plan, Gopher State Solar will be responsible for
12 all costs to decommission the Project and associated facilities. Gopher State Solar
13 is committed to posting a bond, letter of credit, or some other form of financial
14 assurance before construction begins.¹⁸ This timing is much sooner than the
15 guidance from the Department of Commerce suggesting that financial assurance
16 payments begin in year 10 of operation and increase over time,¹⁹ yet Gopher State
17 Solar has committed to providing it before the start of construction for this Project.
18 To ensure a sufficient amount of money is available for decommissioning the
19 Project, the financial assurance will be adjusted every 5 years during the
20 decommissioning plan reassessments to offset any increase or decreases in
21 decommissioning costs and salvage values.²⁰

22
23 **Q. Has Gopher State Solar prepared a visual screening plan for the Project?**

¹⁶ Decommissioning Plan at 6-1.

¹⁷ Decommissioning Plan at 6-1.

¹⁸ Decommissioning Plan at 7-1.

¹⁹ See EERA Decommissioning Plan Guidance at 4.

²⁰ Decommissioning Plan at 7-1.

1 A. Gopher State Solar is currently engaging with the local community as a preliminary
2 step to inform the visual screening plan that will be finalized closer to the start of
3 construction, as is typical for utility scale solar projects.
4

5 **Q. Please summarize the comments Gopher State Solar has received from**
6 **Renville County regarding vegetative screening.**

7 A. In its scoping comments, Renville County requested that Gopher State Solar
8 provide screening by planting and maintaining trees along roadways and in front
9 of non-participating residences.²¹
10

11 **Q. What is Gopher State Solar's response to Renville County's comments**
12 **regarding vegetative screening?**

13 As stated in Section 4.2.6.3 of the Application, the visual impact of the Project is
14 expected to be limited to higher elevation points, as well as immediately
15 surrounding land, it will be mitigated to an extent by existing vegetative
16 screening at most residences and additional mitigative plantings pending
17 finalization of landowner agreements. Gopher State Solar would like to clarify that
18 the pending landowner agreements on visual screening mentioned in the
19 Application will be finalized through engagement with the non-participating
20 residences adjacent to the Project. During Gopher State Solar's call with Renville
21 County staff, it appears that Renville County staff recognized that placing
22 vegetative screening along 6.5 miles of county roads would be impractical, and
23 prioritizing screening in front of the non-participating residences adjacent to the
24 Project would be more in-line with the County's interests.
25

26 IX. CONCLUSION 27

²¹ Written Comments on the Scope of the EA at 3 (Nov. 26, 2024) (eDocket No. 202411-212453-01).

- 1 Q. Does this conclude your Direct Testimony?
- 2 A. Yes.

GSS Ex. ___, Trevino Direct, Schedule A

Sergio A. Trevino

1912 Hether Street | Austin, TX 78704 | (512) 827-1924 | sergio@rangerpower.com

Employment Experience

Vice-President of Development & Siting, Ranger Power, LLC; Chicago, Illinois; 2018-Present. Responsible for solar, wind, and storage prospecting and development from inception through financing across multiple states in the Midcontinent Independent System Operator (MISO), Southwest Power Pool (SPP), Pennsylvania-New Jersey-Maryland (PJM), and Western Power Pool (WPP) regional transmission organization territories, including:

- Identifying prospect sites that satisfy interconnection, permitting, land acquisition, and construction criteria for additional due diligence, and selecting sites to move forward into development;
- Developing a land acquisition strategy for development assets and managing development managers and land agents to achieve land acquisition targets;
- Developing a permitting strategy to meet local, state, and federal requirements, and managing execution with development managers and permitting consultants, including attending local, state, and federal permitting meetings and managing complex permitting challenges;
- Managing title curative, ALTA survey, due diligence pre-construction coordination, and all other aspects of development to ensure a successful project financing process;
- Evaluating M&A opportunities.

Highlights include:

- Successfully developed over 1 GW of operating solar projects and another GW of projects in construction;
- Applicant's representative for the 150 MW Onion River Solar project (now owned and operated by Alliant Energy) before the Public Service Commission of Wisconsin for the approved Certificate of Public Convenience and Necessity;
- Permitting and due diligence lead on the 239 MW Assembly Solar project;
- Development and due diligence lead on the 140 MW White Tail Solar project, which included guiding the project through a complex, multi-jurisdictional permitting process, successful appeal of a zoning permit denial, and negotiation of multiple agreements with permitting authorities.

Development Manager, Pioneer Green Energy, LLC; Austin, Texas; 2010-17. Participated in developing over 1,250 MW of operating renewable energy projects, primarily in Electric Reliability Council of Texas (ERCOT). Responsibilities included prospect identification and evaluation; land acquisition; budgeting; resource data collection/analysis; federal, state, and local permitting; managing transmission interconnection; obtaining tax incentives; and title cleaning and ALTA survey.

- Development and due diligence lead for the 93-MW San Roman Wind project;
- Assisted in the completion of due diligence requirements for multiple project sales;
- Obtained Bureau of Land Management (BLM) and Forest Service National Environmental Policy Act permits;
- Managed successful permit appeals with BLM, the Federal Aviation Administration, the Department of Homeland Security, and the Fish & Wildlife Service;
- Secured land rights for over 45,000 acres and approximately 15 miles of right-of-way.

4th Grade Bilingual Teacher, Oak Springs Elementary; Austin, Texas; 2007-10. Responsible for core subject instruction to a bilingual, economically disadvantaged population. Served on the Campus Advisory Council and the Discipline, Bilingual, and Grant Committees.

Attorney, Tanzy & Borrego Law Offices; El Paso, Texas; 2005-07. Managed Chapter 7 & 13 bankruptcies from initial filing to final discharge.

GSS Ex. ___, Trevino Direct, Schedule A
Education

The University of Texas School of Law, Austin, Texas
J.D., 2005

The University of Texas at Austin

B.A. (Honors) Plan II Honors Program, 2002; B.A. (Special Honors) Philosophy, 2002; minor in Spanish.

- Phi Beta Kappa, 2002
- University Honors 2000, 2001, 2002

Additional Skills & Information

- Native Spanish speaker. Fully bilingual and bicultural.
- Plan II is an interdisciplinary honors major designed to provide a wide-ranging education with distinguished professors at the University of Texas, culminating in a year-long Senior Thesis.

Prepared – February 2025

FW: [EXTERNAL] Gopher State Solar Renville County

Rosanne Koneval <rosanne@rangerpower.com>

Thu 8/29/2024 11:14 AM

To: Zane Jones <zane@rangerpower.com>

From: Leonard Wabasha (TO) <leonard.wabasha@shakopeedakota.org>

Date: Thursday, August 29, 2024 at 10:47 AM

To: Rosanne Koneval <rosanne@rangerpower.com>

Subject: [EXTERNAL] Gopher State Solar Renville County

You don't often get email from leonard.wabasha@shakopeedakota.org. [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Roseanne Koneval

Thank you for the information concerning the Gopher State Solar Project in Renville County Minnesota. At this time, the Shakopee Mdewakanton Sioux Community will leave direct consultation to the Lower Sioux Indian Community and any other Federally Recognized Tribe with interest in the project. We would like to be kept informed of the progress of the project. Thank you and Have a Great Day!

Respectfully,



LEONARD WABASHA

Tribal Historic Preservation Officer • Cultural Resources

Shakopee Mdewakanton Sioux Community

d: 952.496.6120

shakopeedakota.org

Leonard.Wabasha@shakopeedakota.org

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

~~~~~  
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DEPARTMENT OF
ADMINISTRATION

STATE HISTORIC PRESERVATION OFFICE

GSS Ex. ____, Trevino Direct, Schedule C

February 20, 2025

William Harding
Merjent
1 Main Street, Suite 300
Minneapolis, MN 55414

RE: Gopher State Solar Project
Construction of a 200 MW utility-scale solar facility
Renville County
SHPO Number: 2023-3117

Dear William Harding:

Thank you for continuing consultation on the above referenced project. We understand that this project will require a Minnesota Public Utilities Commission site permit. Therefore, the information submitted on February 7, 2025, has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (138.665-666). If this project will be located on non-federal public land, the project will also be subject to review under the Minnesota Field Archaeology Act (138.40).

As stated in your correspondence, Gopher State Solar, LLC is proposing to construct a utility-scale solar generation project 1.2 miles north of Bird Island in Renville County. The Gopher State Solar Project will have a generating capacity of up to 200 MW and will comprise approximately 1,700 acres.

We have reviewed Merjent's response letter dated December 19, 2023, as well as the submitted report, *Phase I Cultural Resource Inventory for the Gopher State Solar Project, Renville County, Minnesota, Addendum Report* (December 2023, Merjent, Inc). Based on the documentation provided, we have determined that no significant archaeological sites will be affected by this project and that there are **no properties** listed in the National or State Registers of Historic Places, or within the Historic Sites Network, that will be affected by this project.

Please Note: Your letter states, "Because of the disturbance from decades of farming, the likelihood of encountering archaeological materials in the APE that are intact and have the potential for eligibility for the National Register of Historic Places is low." We do not agree with this statement and want to remind the archaeologists that National Register Bulletin 36, *Guidelines for Evaluating and Registering Archeological Properties* references plowed sites and has examples of eligible sites in plowed fields.

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.

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

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

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

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

GSS Ex. ___, Trevino Direct, Schedule C

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson, Environmental Review Specialist, at 651-201-3285 or kelly.graggjohnson@state.mn.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Amy Spong', with a stylized, cursive script.

Amy Spong
Deputy State Historic Preservation Officer



RE: Area of Impact

From Kyle Richter <kyler@renvilleswcd.org>

Date Fri 10/25/2024 1:30 PM

To Zane Jones <zane@rangerpower.com>

Zane,

Yes, but those were larger scale projects, I have not seen smaller scale projects be applied for before.

Kyle



KYLE RICHTER

Resource Conservationist

Office: (320) 523-1559 Cell: (320) 522-4631
1008 W. Lincoln Ave, Olivia, MN 56277
<https://www.renvilleswcd.org/>

From: Zane Jones <zane@rangerpower.com>

Sent: Friday, October 25, 2024 9:15 AM

To: Kyle Richter <kyler@renvilleswcd.org>

Subject: Re: Area of Impact

Thanks for your help with this Kyle.

During our meeting you said that you have not seen many easement alternations approved. Was that referring to the process of 2:1 acre replacement?

From: Kyle Richter <kyler@renvilleswcd.org>

Sent: Thursday, October 24, 2024 4:02 PM

To: Zane Jones <zane@rangerpower.com>

Subject: FW: Area of Impact

Hi Zaen,

Below is the response from the state.

Let me know if you have any questions, or need further clarification on any of this.

Regards-

Kyle



GSS Ex. ___, Trevino Direct, Schedule D

KYLE RICHTER

Resource Conservationist

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<https://www.renvillewcd.org/>

From: Swenson, Karli (BWSR) <karli.swenson@state.mn.us>
Sent: Thursday, October 24, 2024 4:01 PM
To: Kyle Richter <kylar@renvillewcd.org>
Subject: RE: Area of Impact

Kyle,

Structures are not allowed on RIM easements or any permanent surface impacts. They would have to apply for an easement alteration to release the area from the easement if they wish to locate structures there. For a private landowner request this would involve a 2:1 acre replacement. Certain utility projects (usually high-voltage transmission lines) are considered public utility projects and can follow the Public Entity section of the policy that would allow the company to compensate BWSR at 2x the current RIM rate for land to be released from the easement IF there is no feasible alternative location for the structures. If this is not a public utility company, and the structures can be located elsewhere, they should find an alternative location off of the RIM easement, as placing structures on the easement would be a violation.

<https://bwsr.state.mn.us/easement-alteration-policy>

Karli Swenson | Conservation Easement Specialist

Minnesota Board of Water and Soil Resources (BWSR)
520 Lafayette Road North
St. Paul, MN 55155
651-440-2456

From: Kyle Richter <kylar@renvillewcd.org>
Sent: Thursday, October 24, 2024 3:50 PM
To: Swenson, Karli (BWSR) <karli.swenson@state.mn.us>
Subject: FW: Area of Impact

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Karli,

There is a large scale solar project going in and some easements will have proposed impacts.

I spoke with Zane last week and told him I would need further information about the impacts.

Do you think this would be allowable on RIM easements?

Kyle



KYLE RICHTER

Resource Conservationist

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From: Zane Jones <zane@rangerpower.com>

Sent: Thursday, October 24, 2024 3:43 PM

To: Kyle Richter <kylar@renvilleswcd.org>

Subject: Area of Impact

Thanks for your time the other day Kyle,

I got some answers and found that the impacts could be as little as a crushed rock foundation for a wooden pole that would be about 4 feet across. The total area impacted would be around 13 square feet if the foundation is circular.

Thanks, let me know if you need anymore details as you get answers from the state.

--

Zane Jones

Assistant Development Manager | Ranger Power LLC

(734) 709-7358 | zane@rangerpower.com

www.rangerpower.com



Re: Gopher State Solar Project in Renville MN

From Rosanne Koneval <rosanne@rangerpower.com>

Date Fri 10/18/2024 3:46 PM

To Trish Leith <Trish.leith@lowersioux.com>; Cheyanne St. John <cheyanne.stjohn@lowersioux.com>

Cc Zane Jones <zane@rangerpower.com>

Thank you for reaching out and letting us know. We will follow up accordingly.

From: Trish Leith <Trish.leith@lowersioux.com>

Date: Friday, October 18, 2024 at 3:40 PM

To: Rosanne Koneval <rosanne@rangerpower.com>, Cheyanne St. John <cheyanne.stjohn@lowersioux.com>

Subject: Gopher State Solar Project in Renville MN

You don't often get email from trish.leith@lowersioux.com. [Learn why this is important](#)

Lower Sioux would like to be identified as an interested/consulting party. Our office is still finalizing the review for this project but will be in touch with comments and questions. Please reach out if you have any questions, and please let us know of any changes.

Thank You

Trish Leith

Trish Leith | Preservation Coordinator

Trish.Leith@lowersioux.com

507-697-8705. Office

Lower Sioux Indian Comm. | 39527 Res Hwy 1

Morton, MN 56270



Solar Project in Renville County - Notification of Field Work

From Emily Straka <emily@rangerpower.com>

Date Fri 5/5/2023 1:31 PM

To Scott Refsland <scottr@renvillecountymn.com>; randyk@renvillecountymn.com
<randyk@renvillecountymn.com>; douge@renvillecountymn.com <douge@renvillecountymn.com>

Cc Zane Jones <zane@rangerpower.com>

Scott, Randy, Doug,

I hope you are well. I am reaching out to give you a heads up that we have on site environmental studies scheduled in the upcoming weeks in Kingman, Osceola, and Bird Island Townships. Cultural surveys are scheduled for the week of May 8th and wetland delineations are scheduled for the week of May 22nd.

These studies will be pedestrian surveys completed by a firm called Merjent. There may be limited soil sampling or testing. No artifacts will be collected on privately owned land. No mechanized equipment will be used in any field for excavation and transportation. The contractors will wear high-visibility orange safety vests, the crew size will be 2 to 4 people, and crews may work on the weekends. There are some portions of the public right of way including Highway 5 and 840th Ave that we also plan to survey.

Feel free to forward this email to other appropriate parties as needed. Thank you.

--

Emily V. Straka

Ranger Power LLC

(303) 478-4664 | emily@rangerpower.com

www.rangerpower.com