

August 10, 2020

Executive Secretary Will Seuffert
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
Saint Paul, MN 55101-2147

RE: Elk Creek Solar Project in Rock County
Public Utilities Commission Docket Number: 19-495

Dear Secretary Seuffert:

On behalf of Commissioner Petersen, Minnesota Department of Agriculture (MDA) appreciates the opportunity to provide comment on the Elk Creek Solar project in Rock County Minnesota. MDA's role in reviewing energy projects under the regulatory authority of the Public Utility Commission (PUC) is confined to those aspects of a project that affect agricultural practice and, principally, the soil resource that supports agriculture. MDA staff has worked with the Department of Commerce – Energy Environmental Review and Analysis (Department) and consulted with Geronimo Energy on aspects of the project that fall within our role.

MDA recognizes the inherent environmental value that renewable energy development brings to the State of Minnesota, however, we also realize that most of this development will occur in agricultural portions of the state. Solar development, in particular, can have a significant impact on agriculture due to the amount of land utility-scale solar development requires as well as the potential to impact the soil resource. Currently, Agricultural Impact Mitigation Plans and Vegetation Management Plans have been required as part of the site permitting process to address protection of the soil resource. The diversion of significant portions of agricultural land to alternative uses generally has not been addressed except in case of certain soil types covered under Minn. Rule 7850.4400.

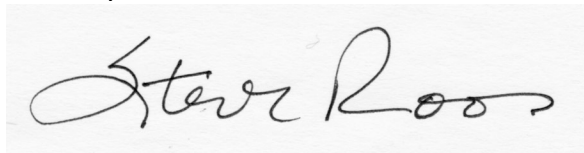
Geronimo Energy has requested that the PUC allow them the option to explore an alternative Vegetation Management Plan, at the request of area farmers, that incorporates perennial agricultural crops that can harvested and/or grazed by regional farmers. MDA is excited by this opportunity as we, along with staff at the Board of Water and Soil Resources (BWSR), have actively been working on bringing perennial crops back into Minnesota in order to diversify agricultural production and gain the environmental benefits of perennial vegetation in the agricultural landscape.

However, as with any approach to successfully manage re-vegetation of a disturbed site, MDA recognizes that success will depend on a well defined and thought out Vegetation Management Plan that specifically addresses the crop vegetation types that might be grown; the management practices to establish and maintain that vegetation; and relationships, including general contractual arrangements, with area farmers to harvest and utilize the crop; along with any other relevant issues associated with perennial agricultural crops. MDA is willing to assist Geronimo Energy in developing an appropriate Vegetation Management Plan for perennial agricultural crops through consultation and review.

MDA wishes to encourage the PUC to allow Geronimo Energy the option for an alternative approach to vegetation management that includes perennial agricultural crops as long as they provide a sound Vegetation Management Plan appropriate for perennial agricultural crops.

MDA thanks you for the opportunity to submit these comments on the Elk Creek Solar project in Rock County Minnesota. If you have any questions about MDA's comments please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Stephan Roos". The signature is fluid and cursive, with the first name "Stephan" and last name "Roos" clearly legible.

Stephan Roos
Environmental Planner
Energy and Environment Section
651-201-6631
stephan.roos@state.mn.us

cc: Commissioner Thom Petersen, MDA
Bob Patton, MDA
Bret Eknes, Minnesota Public Utilities Commission
Louise Miltich, Minnesota Department of Commerce
Bill Storm, Minnesota Department of Commerce