

Sherburne County Board of Commissioners

Sherburne County Government Center
13880 Business Center Drive
Suite 100
Elk River, MN 55330-4668
(763) 765-3001
1-800-433-5229

September 13, 2021

Bill Storm
Minnesota Department of Commerce
85 - 7th Place East, Suite 280
St. Paul, MN 55101

Re: *In the matter of the Application for Xcel Energy for a Site Permit and Two Route Permits for the Sherco Solar Project*

PUC Docket No. E002/GS-21-191, E002/TL-21-190 & E002/TL-21-189

Dear Mr. Siefert and Commissioners:

Sherburne County appreciates the opportunity to comment on the application for the site permits for the 460 Megawatt Sherco Solar Energy Generating System and associated transmission lines in Sherburne County.

We are submitting comments today in response to the Commission's request for comments in this docket: "What potential human and environmental impacts of the proposed project should be considered in the environmental assessment? Are there any methods to minimize, mitigate, or avoid potential impacts of the proposed project? Are there any unique characteristics of the proposed project site that should be considered?"

The County would like to ensure the following ordinance related issues are included in the site plan:

West HVTL Project Area

1. A portion of the project is located in the Shoreland District of three natural environmental lakes (71-143, 71-137 & 71-138). The Sherburne County Zoning Ordinance, Section 16.2, Interim Use Permits, Subd 5 (21) A5 does not allow solar farms within 1,000 ft of a lake. A portion of the proposed location of the solar farm is located within the 1,000 ft area. What are the proposed setbacks from the lakes?
2. The southern portion of the solar farm area includes property located in the Mississippi Recreational River District. The Sherburne County Zoning Ordinance, Section 16.2, Interim Use Permits, Subd 5 (21) A7 does not allow solar farms in the Mississippi Recreational River District.

3. The Sherburne County Zoning Ordinance, Section 16.2, Interim Use Permits, Subd 5 (21) C9 requires that six (6) foot tall coniferous trees be planted about the entire perimeter of the solar farm. Are coniferous trees going to be planted around the perimeter of the solar farm?
4. A wetland delineation of the project site has been submitted to Sherburne County for the Wetland Conservation Act, Technical Evaluation Plan to review and approve, however, no determination on wetland impacts have been submitted. What, if any, wetland impacts are proposed? If impacts are proposed would the wetlands be replaced or is Xcel proposing to purchase existing wetland credits?

East HVTL Project Area

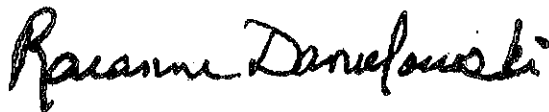
1. While Becker Township does it's own Planning and Zoning, the proposed solar farm is in close proximity to Big Lake Township where solar farms cannot be located within ½ mile of US Highway 10 to preserve future commercial and industrial uses.
2. The Sherburne County Zoning Ordinance, Section 16.2, Interim Use Permits, Subd 5 (21) C9 requires that six (6) foot tall coniferous trees be planted about the entire perimeter of the solar farm. Are coniferous trees going to be planted around the perimeter of the solar farm?
5. A wetland delineation of the project site has been submitted to Sherburne County for the Wetland Conservation Act, Technical Evaluation Plan to review and approve, however, no determination on wetland impacts have been submitted. What, if any, wetland impacts are proposed? If impacts are proposed would the wetlands be replaced or is Xcel proposing to purchase existing wetland credits?

The proposed solar project will encompass approximately 3,479 acres of agricultural land, while there are positive impacts including pollinator/native plantings, possible soil regeneration and reduction of water being pulled from the aquifer, Sherburne County notes that the proposed solar project will result in loss of productive agricultural land and impact the local agricultural economy.

As you know, Xcel Energy intends to close two of the three coal units at the Sherco Generating Station by 2023 and 2026. This will result in a substantial number of job cuts and an extraordinary loss of tax base for the City, County and the Becker School District. For the County, the closing will mean the loss of 150 direct and 250 indirect and induced jobs in our area. Those 400 jobs have an annual impact of over \$200,000,000 on the regional economy. The loss of that economic impact is not something the City and the County can easily sustain.

It would be difficult to overstate the importance of this project to our local community as we try to prepare for the eventual closing of Sherco coal units 1 and 2. While we support the general concept of the project, we do have concerns regarding the location as proposed. We encourage Xcel Energy to continue to have active conversations with the City regarding the issues identified.

Sincerely,



Raeanne Danielowski
Sherburne County Board of Commissioners - Chairwoman