



February 21, 2024

Melissa Schmit
8400 Normandale Lake BLVD
Suite 1200
Bloomington, MN 55437

RE: Harmony Solar Project, Cass County, ND. PSC Case No. PU-18-219

Dear Melissa Schmit:

Thank you for reaching out to the North Dakota Game and Fish Department (Department) about the proposed utility scale solar energy project in Cass County, North Dakota. Though the project has already been permitted, the Department appreciates the opportunity to provide input, as our understanding of and involvement in solar development has changed since the project was first introduced to us in 2017. Though we understand that much of this project is finalized, as a permit was granted in 2019, we would still like to include in this letter our list of recommendations for consideration. Based on the original permit application, it appears as if many of these concerns have been addressed already, but if there are any further questions or concerns, the Department would be happy to meet with National Grid Renewables Development LLC and discuss these recommendations further.

1. Site Selection

- a. Adhere to criteria laid out in 69-06-08-01 of the North Dakota Administrative Code, which specifies areas of exclusion and avoidance for energy conversion facilities (<https://www.ndlegis.gov/information/acdata/pdf/69-06-08.pdf>).
- b. Select a site with minimal risk to wildlife. Refer to Figure B11, Key Native Wildlife and Habitat Areas, in *Wind Energy Development in North Dakota – Best Management Practices*, to assess the potential risk of the site selected (<https://gf.nd.gov/node/4800>).
- c. Avoid areas of unstable land surfaces such as slopes and areas prone to erosion.
- d. Avoid state or federally owned/operated land (including, but not limited to, Wildlife Management Areas, Private Land Open To Sportsmen, National Wildlife Refuges, etc.)

2. Micro-sitting

- a. Habitat loss:
 - i. Focus on avoidance: micro-sitting sites away from native/unbroken habitat (grasslands, woodlands, and wetlands), before moving to

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Agency Correspondence
North Dakota Game & Fish Department
Greg Link, Chief

Governor
Doug Burgum

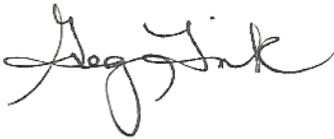
Director
Jeb Williams

Deputy Director
Scott A. Peterson

stem the decline of our state's rare and sensitive species and prevent listings through the Endangered Species Act, which could impact both the state and its citizens. The Department recommends that any acre of habitat broken due to development be replaced at a 1:1 ratio. For example, if 100 acres of native grasslands are going to be developed for solar energy, 100 acres of grasslands should be planted within the county to offset that impact. These plantings should also be protected for the life of the project.

Thank you for the opportunity to comment on the proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Link". The signature is fluid and cursive, with the first name "Greg" and last name "Link" clearly distinguishable.

Greg Link
Chief, Conservation and Communications Division

Cc: Heidi Riddle, US Fish and Wildlife Service
ND Public Service Commission