

The following is the agenda for **Thursday, February 26, 2026 at 6:00pm** the Todd County Board of Adjustment will hold a public hearing in the Commissioner's Boardroom, Historic Courthouse, 215 1<sup>st</sup> Ave South, Suite 301, Long Prairie.

NOTE: This meeting is again being held in-person and the public is encouraged to attend. Those who do attend in person can find parking atop the hill on the west side of the Historic Courthouse and enter through the North Doors, near the American Flag and monument.

If you have any concerns or questions in regard to the upcoming meeting and the applications on the agenda, feel free to contact the Planning & Zoning Office at either **(320) 732-4420** or [toddplan.zone@co.todd.mn.us](mailto:toddplan.zone@co.todd.mn.us). All correspondence must include name & mailing address and be received 48 hours before the date and time of the hearing.

### **Agenda**

- Call to Order
  - Pledge of Allegiance
  - Introduction of Board of Adjustment Members and process review
  - Approval of agenda
  - Approval of December 18th, 2025 & January 22, 2026 Board of Adjustments meeting minutes
  - The applicant is introduced
    - Staff report
    - Applicant confirms if staff report accurately represents the request
    - Site Visit Review
    - Public comment
    - Board review with applicant, staff, and public
1. **Mathew Parker:** Section 19, Birchdale Township, Long Lake  
**Site Address:** 11899 Bluegill Dr., Sauk Centre, MN 56378  
**PID:** 03-0072000
    1. Request to reduce the lake setback from 150' to 90.3' for a dwelling addition
    2. Request to reduce the lake setback from 150' to 90.3' for the addition of an attached garage
    3. Request to increase the height limit from 18' to 28' for non-conforming dwelling addition all in Natural Environment Shoreland Zoning District.
  2. **Stephen Neville:** Section 20, Grey Eagle Township, Big Birch Lake  
**Site Address:** 30139 122<sup>nd</sup> Street, Grey Eagle, MN 56336  
**PID:** 11-0046000
    1. Request to increase the allowed roofed impervious surface coverage from 15% to 22.7% for dwelling addition in Recreational Development Shoreland Zoning District.
  3. **Variance Application Criteria Discussion**

**Adjournment.**

Next meeting: **March 26, 2026**

## Minutes of the Todd County Board of Adjustment Meeting

December 18, 2025

Completed by: Sue Bertrand P&Z Staff

Site visit for USS Eagle Bend Solar completed by Ken Hovet and Adam Ossefoort on 12/15/2025

Meeting was attended by board members: Chair Russ VanDenheuvel, Vice Chair Bill Berscheit, Dan Peyton, alternate Larry Bebus and Planning Commission Liaison Ken Hovet.

Staff members: Adam Ossefoort and Sue Bertrand

Other members of the public: Sign-in Sheet is available for viewing upon request.

Russ called the meeting to order at 6:00 p.m. and the Pledge of Allegiance was recited. Each board member introduced themselves and Russ explained the process for those attending.

Danny motioned to have the agenda approved as presented. Bill seconded the motion. Voice vote, no dissent heard. Motion carried.

Bill motioned to have the November 20, 2025, meeting minutes approved. Ken seconded the motion. Voice vote, no dissent heard. Motion carried.

### **AGENDA ITEM 1: USS Eagle Bend Solar LLC: -- PID-- 28-0001100 -- Wykeham Township**

Request(s):

1. Request to remove the prime farmland solar restriction from Section 9.20 to allow for the submission of a CUP application for a 10-megawatt solar energy system in AF-1 Zoning District.

Luke Gildemeister, Project Developer and Tina Munson, Senior Vice President Project Developer at US/Solar, were present as the applicants.

Staff Findings: Adam read the staff report. The staff report is available for viewing upon request in the Planning & Zoning Office.

#### **Proposed Conditions, if approved:**

1. Proposed project must be constructed in compliance with Section 9.20 of the Todd County Planning and Zoning Ordinance.
2. Variance shall lapse and be void if not substantially completed within 36 months from the granting of this variance in compliance with Section 5.03G of the Todd County Planning and Zoning Ordinance.
3. Applicant shall abide by all other applicable federal, state, and local standards.

Luke stated the staff report was accurate.

Luke stated, he works as a project developer for US Solar and is representing US Solar and Jean Greenwaldt. US Solar is a Minnesota based medium sized business of about 90 employees. They develop, own and operate Solar Farms. Jean Greenwaldt is the owner of the 122-acre parcel, located at 14910 380<sup>th</sup> Street in Eagle Bend. US Solar and Jean signed a lease agreement in the Spring of

2025. In the Summer of 2025 MN Power issued a request for proposal asking for developers like US Solar to propose additional Solar resources within MN Power's territory. US Solar proposed this project, and the project has since been shortlisted by MN Power, meaning the utility has interest in adding electricity at this location. The proposed project is currently being studied by MN Power. US Solar is requesting a variance from Todd County's prohibition of Solar Farms on land identified as prime farmland, as defined by the USDA. (Section 9.20 Todd County Ordinance) Solar farms are allowed in Agricultural and Commercial Zoning Districts within Todd County via a Conditional Use Permit, however not currently permitted on prime farmland. Luke stated US Solar believes they should be allowed to submit a Conditional Use Permit on behalf of Jean. USS Eagle Bend Solar LLC would be a 10-megawatt Solar Farm located on approximately 54 acres of Jean's 122-acre parcel. The proposed project would interconnect to MN Power's Eagle Valley electrical substation, which is located to the NE of Eagle Bend. Within the fenced acreage of the project, there would be rows of solar panels, spaced about 16' apart, panels 6' to 8' tall, depending on the time of day. The panels would attract the sun daily and reset at night. Pollinator habitats would be planted underneath and in between the rows of modules. The project would be fenced in by a farm field style wire fence with wooden posts. The fence would be about 7' tall with a small gap at the bottom. No proposed lighting. Todd County requires vegetative tree screening along all public roadways; therefore, US Solar would plant one row of Eastern Red Cedar or something similar outside of the projects eastern fence line. Other than Jean's residence, there are no households located in the immediate vicinity of the proposed project. USS Eagle Bend Solar would make for a quiet neighbor, there would be no noticeable odor, light or sound as a result of the project. According to the lease agreement between Jean and US Solar, and according to section 9.20 of the Todd County Ordinance, US Solar would be required to decommission the project within 12 months of the end of the project's life span. According to section 9.20 of the Todd County Ordinance, US Solar would also be required to post a bond, letter of credit or escrow of \$125,000 per mega-watt to ensure their decommissioning of the project. According to the USDA's web soils survey, there are five distinct soil types within the 54-acre proposed project area. Approximately 58% or approx. 31 acres is considered prime farmland. This is the reason for the request for our variance. The criteria for granting a variance are set forth in Section 5.03 of the Todd County Planning and Zoning Ordinance. He stated he will quickly demonstrate how their project meets the criteria, and Luke read through his answers to criteria questions.

1. Is the variance in harmony with the general purposes and intent of the official control?

Yes, Todd County's ordinance in section 5.03 Variances: states that variances may only be granted when there are practical difficulties in complying with the official controls. The same section of the ordinance also states that the Board of Adjustment may consider the inability to use solar systems a practical difficulty in the granting of variances.

2. Is the variance request consistent with the goals and policies of the comprehensive plan?

Yes, the allowance of a solar farm on Prime Farmland is within the Utilities, Energy and Communications section, Todd County states that, to be a good neighbor to nearby counties and to the world, "the County needs to help businesses and individuals reduce their environmental

impacts.” When referring to renewable energy generation methods, the comp plan states that “Todd County should explore and encourage individuals to install and use these technologies”. The comp plan also states within its’ “Goals and action Plan” that Todd County should “adopt ordinances that encourage reasonable usage and deployment of individual renewable energy creation methods”.

3. Is the property owner proposing to use the property in a reasonable manner not permitted by an official control?

Yes, the proposed solar farm use is reasonable. Solar farms are allowed in Todd County’s Ag and Commercial districts as a conditional use.

4. Is the need for a variance due to the circumstances unique to the property not created by the landowner?

Yes, the problem was not caused by Jean Greenwaldt, as soil classification is determined by the USDA. Due to the citing requirements of solar facilities, including willing landowners, acreage, proximity to existing electrical infrastructure, and location within MN Power’s service territory, this Solar Facility is in a unique location where the factors come together.

5. Will the variance maintain the essential character of the locality?

Yes. Solar is an allowed conditional use in the Ag-1 district, and will maintain the agricultural characteristics of the area, with farm field page wire fencing, with wooden posts and pollinator friendly habitat underneath and in between solar modules, which has the additional benefit of reducing soil erosion, and storm water run-off uses.

6. Does the need for the variance involve more than just economic considerations?

Yes, the primary consideration is MN Power’s need for additional energy capacity to meet state law. The law requires MN Power to have at least 3% of its’ retail electric sales to come from small solar energy systems by the end of 2030. Projects must be sited in their service territory, and near existing electrical infrastructure which ultimately requires the facilities to be in the ag district.

7. Have safety and environmental concerns been adequately addressed?

Yes, the project would not cause any safety concerns. The solar farm would be fully fenced. It would also have security cameras and be remotely monitored by US Solar. USS Eagle Bend Solar, LLC would also not cause any environmental concerns. There are no hazardous materials involved in our solar farms. A wetland delineation was also conducted on the project site, and the project would be cited to minimize said impact to wetlands. US Solar regularly coordinates with emergency service providers, to ensure access and knowledge of this site should there be any concerns.

Luke added, Jean is a responsible steward of her land. She’s a tax paying resident with property rights and she’s lived on this parcel for decades. The requested variance is the minimum variance that would alleviate the practical difficulties she is experiencing. Jean’s situation meets all criteria within section 5.03 of Todd County’s ordinance, which allows for the granting of the requested variance. Jean and US Solar would greatly appreciate the opportunity to submit an application to

Todd County in the coming months. Together with Jean and the elected officials of Todd County, we believe US Solar can ensure that USS Eagle Bend Solar, LLC operates in a responsible manner. We respectfully request that the Board of Adjustment grant US Solar and Jean a variance.

Ken went over his site visit report. This report may be viewed fully upon request at the Planning and Zoning Office. He stated he knows a portion of the land is prime farmland.

Correspondence received: None.

Public comment: None.

Board discussion:

Bill mentioned the reclamation was covered in your presentation, in a couple of different ways. Adam, this board and the board of Commissioners have known this issue would be coming before them, for some time. Was hoping to add it in the list of conditions that reclamation be covered either through monies in escrow, as Luke mentioned, or in some way shape or form.

Adam stated we certainly could, if the board wishes. It's already required in the ordinance, and even if this is granted tonight, they still have to go through that CUP process, where they will review, more specifically, the aspects in more detail, of the reclamation plan.

Bill also mentioned the 7' fence, however, he stated, we do have height limits to the fence already, and wondered if the board would like to address that now instead of having that come back at us?

Ken mentioned, Planning and Zoning will address that too.

Bill stated his final question in regards to this specific project, he has seen in other projects throughout the country, what is underneath is grazed, and is that something you folks look at, as part of these projects? Thinks, although the renting is quite expensive, it gives it more of a public appeal, adds more to the value and keeps it in touch with what is around it, if there is grazing underneath it. Please consider that as you come into rural Minnesota.

Adam read from the ordinance on fences, in residential, fences shall not exceed 6' in height, and not more than 10' in height for commercial and industrial districts. Higher than these shall require a variance. This is also from our public nuisance section, for disguising public nuisance situations and for screening purposes. Not a lot of language specifics to agricultural areas.

Bill asked if they should include the 7' fence in a condition so it is covered, as part of this variance?

Adam, that is entirely appropriate, as it is in line with what they are proposing.

Larry asked how much of the solar project is actually on prime farmland, out of the 54 acres?

Luke stated approx. 31 acres in the proposed fenced area.

Bill asked what criteria they are using to deem prime farmland? Soil types? CPI?

Luke stated USDA's own web soil survey. So, it's their own soil type classifications.

Tina answered she didn't think they gave her specific soil types in front of them...

Adam clarified it is not CPI, it is what our GIS system uses to describe "Prime Farmland" or "All areas are prime farmland if drained" and he demonstrated 720B area on Greenwaldt's land is prime farmland.

Bill asked if we are basing that on CPI?

Adam stated he wasn't sure if the USDA uses some part of that in their definition, we just use what they describe.

Bill explained CPI is a standard if you were to auction this real estate off. An auctioneer is going to list this piece of real estate a certain CPI and advertise it as a certain CPI. That's what they are going to use to promote it. In Todd County, CPI is a deceptive number, it does not work well, as Danny can attest to that, adding, Bill and his wife farm acres and the absolute highest CPI rating is his absolute worst field. So, when you pull out USDA information and put it before us, as something that should or should not determine this as prime farmland, it creates a hurdle that is somewhat difficult to cross, but it is not really based in reality. That is part of his point and the point he has made to the commissioners, if we are not addressing this prime farmland thing cleanly, we are setting ourselves up to push these solar projects into wetlands, forests and other areas and not opening up the acres that really are generating the revenue off of these projects, where they should be.

Adam pointed out the different soil categories on Greenwaldt's property according to our GIS soil map.

Tina stated the ordinance states "prime farmland" so they are working their best within that definition, and understands it's never quite that easy, however, it is consistent data that everyone can use, throughout the different areas, that is readily available to the public. MN Power's service territory is here, in Todd County, and now, they are looking for smaller solar projects. They must provide electrical infrastructure, and the demand factors will lead to a very narrow number of parcels being available, where you could put a facility that would be efficient. On top of that, you must have a willing landowner. Virtually nowhere in Todd County you could put a solar facility that would be efficiently located that would not have prime farmland issues. If Todd County is interested in having or allowing solar facilities here, in the sense their utility is looking for it, there is a demand for it, you will continue to have this prime farmland piece come across your bench, because this is where they go and what they look like. Excel has had a larger demand than MN Power, until recently. They did research all the places Todd County has power lines, substations, where they go and what does that look like, and they are pretty well aware of the options available in Todd County.

Russ asked if the Greenwaldt farm is on MN Power?

Luke, yes. Explained the facility would generate electricity and it would go to the point of inter-connection poles, and that would be MN Power's infrastructure, which would then run to and from the electrical sub-station.

Russ asked why the lease agreement was filed in Hennepin and Wadena Counties both, and not in Todd County?

Luke, it is where the notary was located when signed. The memorandum of the lease was recorded here, at Todd County.

Russ, how high are the panels?

Luke, generally 6' to 8' tall and it will depend on the time of day. They are called single axis trackers. So, you are going to track the sun from East to West every day. Explained at noon they would be parallel to the ground, then go to the West, then reset at night.

Russ asked for clarification on the Decommission, understands in 25 – 35 years, you guys pay for that?

Luke stated that is correct. According to a CUP that is granted by the commissioners, there is the condition they would have to pay \$125,000 per mega-wat, so, do the math, and that comes to \$1.25 million, either a letter of credit, escrow, or performance bond, and additionally there is a lease agreement with Jean that requires US Solar to take it out.

Russ, to be clear, Todd County, at the end of that 25 years will not be stuck with getting rid of those solar panels?

Luke, that is correct, that is the reason for that financial surety.

Adam explained, if US Solar went away, the County can still access those funds to still decommission the site if they didn't take care of it.

Danny stated commissioners voted not to allow solar farms on prime farmland, struggling with this whole deal, did not give us a percentage or leeway onto that. He is looking at 57% and all of a sudden, we are overriding the county commissioners after we very recently proposed not on prime farmland.

Bill stated he and his bride have been approached numerous times with solar plans and they have come up with these exact issues. The commissioners stated they were going to have discussions and we are invited, and that has not happened. What Bill gathers from the commissioners is, they want to see it here before they overreact to it. His impression is he doesn't see any resistance from the commissioners in looking at Prime farmland as a hurdle but looked at it as a criterion to be put in place to be addressed so we didn't end up with what happened in the 80's and 90's with the Poplar trees disaster. Case by case basis comes to mind and at some point, we must get past case by case, as that is working with bad law. Bill stated for himself, he is thrilled they are here, he is impressed with the application and wanted to see some type of solar go forward in Todd County. Solar and Wind represent a lot of dollars that are going out of Todd County by tax payors and bringing

absolutely nothing back into Todd County, at this point. At some level, we have to observe that, we have to embrace this and we have to figure out how we are moving forward. Is this the perfect case? He doesn't know that it is, but knows enough about what the young lady presented as far as the very limited places it can actually go because of our electrical grid, because of what is available out there, that we are not talking about a lot of real estate County wide, it is a very rare, cherry picked, piece of geography that we are ever going to be discussing as far as solar. Wind? Maybe slightly different, but solar, it's very limited.

Luke reminded all that the ordinance states "the Board of Adjustment may consider the inability to use solar energy systems a practical difficulty, in the granting of variances". He also mentioned the financial portion, just an estimate based on the proposed project size, it is a "Solar energy production tax" so, when it comes to revenue, we are looking at 25-year initial term for the project, and within the lease there are extension's up to 40 years, you are looking at approximately \$605,000 production tax revenue (25-year). So, about \$484,000 would go to Todd County throughout that 25-year term and about \$121,000 give or take would go to the township, whom we have already met with, for this application.

Danny asked what that was per year?

Tina stated this is a production estimate and Luke continued, of approximately year 1: 80% is \$20,500.00 to Todd County and 20% to the township would be about \$5,100.00.

Russ asked what they say is the practical difficulty?

Tina stated it is specifically laid out in our Todd County code the "Board of Adjustment may consider the inability to use solar energy systems a practical difficulty". Pretty unique.

Adam added, what they are referring to is in the Variance Section of the ordinance, part B, Variance Criteria, subpart 7, it says, "no variance may be granted that would allow any use that is prohibited in the Zoning District in which the subject property is located. The Board of Adjustments may consider the inability to use solar energy systems as a practical difficulty, in the granting of variances"

Ken stated he has purposely not said anything tonight, because, you know ordinances like this start at the Planning Commission, and he remembers when we did this one. There was a lot of concern from our own commission people and other people from the public, on putting these on farmland. Nobody liked it. We didn't think we could prohibit them from putting it on farm ground entirely, so we used prime farm ground as a compromise. We know that agriculture is our biggest industry, by receipts and by employment, anyway you want to measure it, it is the biggest ear in Todd County. We didn't feel we wanted to inhibit that, by taking away its most valuable asset. So that is where he is at on it, and that is how he is going to vote and the commissioners agreed.

Danny stated he felt the commissioners put it back on the Board of Adjustment and he feels the commissioners are the ones who should figure it out if Todd County wants these or not.

Ken told Danny the commissioners did tell us, and that is how their answer is worded in the ordinance.

Bill stated he doesn't struggle with it as much as he sees Solar Farms as farming. There are limited geographies where we put potatoes, limited geographies for sugar beets, and very limited geographies for Solar. He remembers a lot of public push back from the public at the time and not necessarily educated pushback, but it still needs to be recognized.

Ken stated all of the reasons we had for what we did, are still valid.

Larry, you talked about planting trees and was wondering how tall and will they reach that height by the time the panels are decommissioned?

Luke, no, 151<sup>st</sup> will be screened by ordinance and typically Eastern Red Cedar tend to work best in weather like today, at 4' to 6' to start, of course it takes a few years, and they also work with a contracted grower to maintain good screening.

Tina stated it is not uncommon to see the protection of farmland and that is always wise from an elected official position with good intention. The reality is you are a rural economy. She is from rural Minnesota and understands the agricultural economy and how a County and a town can function. She stated she is not a farmer. Where the challenge comes is that it is completely prohibiting solar. This part of the ordinance is prohibiting solar and we aren't going to cover your whole County in Solar. It is a very small piece in terms of having to be able to load and infrastructure. She stated they do have a lot of sheep grazing on a lot of their sites, so if that is a condition that would make the Board of Adjustment feel more comfortable with maintaining a deeper concept of agricultural use on the prime farmland here, we are more than happy to do that. They have also grazed cattle, but usually the cattle come from the farmer with the panels. She offered they could do sheep along with the pollinator mix, as well.

Russ was concerned about the land taken out of the rotational planting, this land may not come back after 25-years as prime farmland, very easily.

Tina explained, typically the soil is much more healthy, due to deep rooted pollinator mix, you give the soil a rest and you don't need to fertilize. It actually improves the top soil, compared to farming it year after year. When you go back and farm it, should it be removed after so many years, it is actually one of the positive effects, after the soil has rested and re-built for decades.

Russ asked, curious, do we have a maximum on how many acres of farmland we can use for solar?

Larry gave an example of this farmer has a solar farm and the next farmer says "I have prime farmland, I want solar panels too" how much of this prime farmland, in Todd County, can we afford to lose?

Ken stated there will never be more acres of prime farmland than what we have now.

Larry, and there will be less after solar.

Bill stated he didn't think there could be too many solar farms as Todd County does not have the electrical infrastructure to reach it. This comes down to geography located near the electrical infrastructure and it is a

very minimal percentage. In his area with both MN Power and REA there is very little geographically that meets the criteria the solar project needs to have that is available. That involves the ability of the substation to take that and/or they need to upgrade the substation and the ability of the transmission line needs to take the power back to the substation which a very small percentage of transmission lines in Todd County that are actually capable of doing that. So, this isn't something that is going to become wide spread over night just because there are dollars available for the land owner, if they sign this lease. It's not going to be a flood gate that we open up, and also as far as solar funding, there is only one more window letting in the spring, and after that the window somewhat closes on Solar.

Tina stated MN Power only has so many mega-watts that they need. So, they did this RFP and they may do another one if they don't get enough mega-watts here, and that will pretty much reach their needs. MN Power's service territory is much bigger than Todd County. She stated they have two other projects they are working on that are also shortlisted. Just to add on to it, you may sign the land but you may not win the contract with the utility, and therefore it never happens. Which is another hurdle there. She stated she wished she had a visual for the board if you think about your County and you think about your towns. Your towns are more or less the place that has the infrastructure for these smaller projects. They, more or less, have one line that exits the city in some capacity, and that is it. So, if you think about it, you are very rural, a lot of space between your towns. If you go all the way up to Staples, Mottley is part way in another County and it has one line, and it is all wet up there. You are talking Long Prairie, Eagle Bend, Browerville they are all so small and have one line. The concern of solar stealing the farmland in your County in a way you are talking, practically, it just can't happen. There is no place to put them and not enough capacity in Todd County. A big town like Monticello, we would have a different conversation.

Russ asked Tina if she represented MN Power?

Tina, no, she just knows a lot about their electrical infrastructure because she has to find it for her projects.

Russ, now Bertha and in Hewitt, the area where he is from, they just rebuilt the substation in Hewitt and are still in the process of it and in Bertha because of solar power. Addressed Bill, you say that there is not a lot of options out there but it only takes them to build a substation to make it available. Right? If this Solar farm goes up, are they ready to hook up now or would they have to build a better line to get to MN Power?

Luke answered, there would be some, they call it, an extension to the three-phase distribution line, to the site. This project is an inactive study with MN Power right now. It is going through the electrical engineering study process as we speak.

Russ, so it could go a lot more places than if...

Luke, you are limited by the distance to the electrical infrastructure. Meaning, you must be, like we are with Jean's parcel, within, give or take, one to two miles, at most, from the existing three phase distribution grid. Additionally, you would like to have an electrical substation like this Eagle Valley substation, that has the capacity to host these kinds of projects.

Danny, the infrastructure you need, is that just a three-phase line?

Luke, yes.

Bill explained, but only a limited distance to the substation. You can't have a three-phase line that's ten miles to town and say you want to put up solar and be able to do it. The projects they were working on, some fell out at two miles. You take the substations, if they're updated, then they are eligible for solar, then you can draw your two-mile circle, then you look at what three-phase power goes within that circle, that is all that's available for solar, that's it.

Danny stated it makes some sense, but asked why the two miles, when you have the three-phase line that can carry that much power?

Tina, a lot of it is more than just capacity, you have thermal loading, you must understand electrical engineering, but the further you get away from the load, the more problems you have. Too expensive to build it out.

Danny stated the three-phase line going past his house supplies about 600 homes and asked about the ten mega-watt number and how many homes could that support?

Luke explained the capacity ratings for solar farms are usually provided in mega-watts, so 10 mega-watts is equal to 10 million watts. So that is how much energy the solar garden can produce at any one time. So, the solar panels direct the energy, there's inverters, so generally speaking about 300 homes per mega-watt, is the general rule of thumb. Times ten is 3,000 homes.

Tina explained what happens is, it will come down to the town and will disperse through the town to where it needs to go. This is why MN Power studies it. How much is it going to take? Where does it go? Do we have any issues with the size or what it looks like? Sometimes the study comes back and says you can only fit  $\frac{3}{4}$  of your facility. Sometimes the study comes back, and they must adjust the size of the project. Tina added, they are waiting for confirmation if that is part of this or not.

Russ, potentially, we could grant this 54-acres, and you may only use twenty-some?

Tina explained we wouldn't go down that small before we get hit economically. It's possible but the way the farmland lays out, like, we are going to be on prime farmland, no-matter what, even if it shrunk to dramatically half, which we don't anticipate.

Danny asked if the panels must be on flat ground to oscillate.

Tina explained, it's better to be flat, up to about 5% or 6% grade before you must grade anything.

Ken noticed this property is a gentle slope about 5%-6% grade to the South. He asked if there are any plans for battery storage.

Luke, solar only, no battery storage.

Tina, not doing storage, it is really expensive and there must be a value coming out on the backside, which this doesn't have, although they did bid both.

Russ called for Criteria Questions individually by request.

<b>Criteria Question #1: Is the variance in harmony with the general purposes and intent of the official control?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Larry Bebus	Yes.
Dan Peyton	Yes, but struggles considerably, as the Ordinance gives us a reason not to, as it's prime farmland, and over 50%, but he will still say yes.
Bill Berscheit	Yes, the Ordinance provides us with a practical difficulty.
Ken Hovet	Yes, in the process we went through when establishing the Ordinance.
Russell Vandenheuvel	Yes.

Majority response- Yes

<b>Criteria Question #2: Is the variance request consistent with the goals and policies of the comprehensive plan?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Larry Bebus	Yes.
Dan Peyton	No, because the official rules state not on Prime farmland.
Bill Berscheit	Yes, the commissioners and Planning and Zoning clearly understood there are significant limitations regarding the placement of solar in regards to wetlands and forestation, and at some point you have to choose a piece of real estate in which to work.
Ken Hovet	No, it does not preserve prime farmland
Russell Vandenheuvel	Yes, agreed with Bill.

Majority response- Yes

<b>Criteria Question #3: Is the property owner proposing to use the property in a reasonable manner not permitted by an official control?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Larry Bebus	Yes, reasonable manner, hate to see Prime farmland given up to non-farmable land, but under these circumstances, says yes.
Dan Peyton	No, due to the percentage of prime farmland.
Bill Berscheit	Yes, agreed with Ken.
Ken Hovet	Yes, a solar farm is a reasonable use.
Russell Vandenheuvel	No, because it is Prime farmland, and the official control says not to use it on Prime farmland.

Majority response- Yes

<b>Criteria Question #4: Is the need for a variance due to the circumstances unique to the property not created by the landowner?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Larry Bebus	Yes.
Dan Peyton	No. The landowner is creating the use of this prime farmland.
Bill Berscheit	Yes, agreed with Ken, prime farmland is unique to this property, just like topography is unique to a lake lot.
Ken Hovet	Yes, it is unique to the property and not created by the landowner.
Russell Vandenheuvel	No, it is unique to the property as it is Prime farmland.

Majority response- Yes

<b>Criteria Question #5: Will the variance maintain the essential character of the locality?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Larry Bebus	Yes, he sees this as farm. Is there anything around there to compare this too? Absolutely not. Quite possible it may never, but right now, we don't know. Hopefully the trees will grow and block all these solar panels out of sight, which is the big thing people have against it is, they want to look out there and see corn fields instead of solar panel fields. Like Bill says, it's still farming.
Dan Peyton	No, the locality is farmland and changing it to solar.
Bill Berscheit	Yes, there is not another solar farm around it, not even a similar windmill to create a locality. These are called solar farms for a reason and sees them as an opportunity for rural America, so, he sees them as part of farming and farming is what's there. Finds the Nexus to say yes, but there is nothing to compare it to.
Ken Hovet	No, significant change in appearance and it is not going to look like a cornfield anymore.
Russell Vandenheuvel	No.

Majority response- No.

<b>Criteria Question #6: Does the need for the variance involve more than just economic considerations?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Larry Bebus	Yes, there is more to it than the economic piece to this, have to look at this as something more than that.
Dan Peyton	No, if these structures were taller, that adds a lot more money to the infrastructure, you could do grazing underneath this, in a reasonable manner, so you could say they were still farming some type of agriculture procedure going on in the same location and not wasting 100% of the land, might put you in a better category. Looks more like economics.
Bill Berscheit	Yes. Awful lot of economics, what you can draw from MN Power and with the landowner. At the end of the day, he clearly understands there is definitely more than economics to this thing. He regrets that you do not have more support from MN Power here, tonight, and you did not have a map that geographically shows the layout of what actually is eligible for power in Todd County. There is a pile more to this than economics, unless we are going to say that infrastructure is irrelevant, but infrastructure is the primary driver of what is going on here, and at this point of the stage, the infrastructure is not the "economics". If we could back up and build an infrastructure, then economics enter in on that level also, but at this point it is about the infrastructure is what brings this piece of geography to the table and sees that as being about an awful lot of things.
Ken Hovet	No, it does not.
Russell Vandenheuvel	No.

Majority response- No.

<b>Criteria Question #7: Have safety and environmental concerns been adequately addressed?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Larry Bebus	Yes, with the deep-rooted grasses, pollinators, storm water run-off and you will be maintaining and updating panels as required.

Dan Peyton	Safety yes, environmental: you could put this in a big debate all by itself between solar panels and nuclear energy, you could go off the deep end and go down that rabbit hole for hours, but to focus on safety, yes.
Bill Berscheit	Yes, environmental concerns, we are doing a lot of this because it is green energy. It would be difficult to bump up against this, he thinks. Yes, the physical part, where the product hits the field, that must be addressed as environmental concerns down the road, and with the conditions proposed, they have been addressed. We have criteria in place.
Ken Hovet	Yes
Russell Vandenheuvel	Yes, he liked their paragraph addressing safety concerns.

Majority response- Yes

Russ asked Tina if they would like to put this application on hold.

Tina stated they are open to table for two things to come back with.

1. They would present a formal grazing plan where they would formally show the board how they would do sheep and talk a little about how they do that on their other projects.
2. They would come with a map showing the infrastructure in the Minnesota territory to help better define the other practical difficulties other than the economic considerations.

She stated they would be very happy to table if the board feels that information would help enable them to obtain a CUP.

Danny asked for a map showing two miles from current substations and what is even available in Todd County that could meet your category of solar fields.

Tina, yes, that will be included and they will also have an overlay of how much of that is Prime farmland.

Ken stated on that map you bring, could it show alternative sites, as he has a hard time believing there are not alternative sites, even if it is only one or two. That this is the only place it would fit on MN Power's grid, primarily.

Tina stated they will show the available land for them to consider based on infrastructure location. Of course, you have to have a willing land owner, and in this case they have already bid this project to MN Power, they liked their price, as it was one of the cheapest, that's how they get there, as it is important for repairs, so they are not allowed to move it as they have the project MN Power has selected. She can't give an alternative, but she will show the land and what generally they already considered before they even worked with this landowner. What they will bring back is this substation can hold this many mega-watts, this substation can hold this many mega-watts, and here is the land around it. As much information from MN Power as they can.

Ken stated his concern was weed control. He's seen sights like this (industrial) and they are nothing but a damn mess of weed

Luke, stated US Solar uses natural resource services that go out during the growing season and mow and maintain and additionally, you would have sheep out there grazing.

Tina added they spot treat for weed control and this industry has gotten "very good" at establishing pollinator mix and at first, to be totally honest, they had some problems, because it takes about three years to establish, but these service providers have gotten very good, over the last thirteen years, at controlling the weeds and

knowing when to go out and making sure we are spot treating, and that's on top of the sheep grazing. She will maybe bring some information on exactly how they will do it.

Ken stated this isn't the place to debate horticulture, but his experience is, you either get to have pollinators, or you get to have weeds. Because you can't spray it.

Tina stated they can spot spray it, and they do. She can bring back more information on how that is managed.

Russ confirmed Tina is willing to table for another month.

Adam, Jan 22<sup>nd</sup> is our next meeting, so we can send the notice that we will be extending this another 60 days.

Bill made a motion to table until the next meeting and Ken seconded.

Voice vote, no dissent heard.

Russ called for a short recess at 7:34 and reconvened at 7:39.

## **AGENDA ITEM 2: E.A.R.T.H. Program discussion**

Correspondence received: None.

Public comment: None.

Board discussion:

Adam stated he had spoken with Jason, our attorney, and he was informed we would have to make it a part of our application criteria in the ordinance (amendment). We could not use it as a pass/fail type situation; to grant or deny a variance, we would still have to go through the criteria and meet the statutory and ordinance requirements. Adam asked about using it in the conditions, the documents could be used as evidence to support the statutory and ordinance criteria but not used "instead". Essentially it creates additional talking points as you go through the criteria. You could use the score to identify areas to create conditions. You couldn't just say we need to raise your score up, but you could look at the score sheet and see where you are lacking in an area and create a condition specific to that. Jason said it did look very interesting in a good way. Adam added, the process to move forward with this would be a commissioner's work session, speak with them about it, then put it on the Planning Commission agenda so we could actually include it in the ordinance. We could have BOA board members be a part of that conversation at the commissioners' work session as well, as we have done that in the past and could figure that out, down the line.

Bill wondered how burdensome it is going to be for future new board members to become familiar with this.

Adam stated he doesn't think there would be a problem, at all, and they would see it is a good tool to have in your toolbox, when assessing properties.

Larry, isn't this a good way to answer the safety and environmental concerns? We won't flunk them or anything, but it will give them a list of things they need to do to add to the property and use for the conditions.

Adam, absolutely.

Dan, agrees it is a good tool, but who's scoring this and who's doing the scoring?

Adam, we have not had that in-depth discussion yet, but it is something the Planning Commission can come up with, as we make it a part of the applications and put this in the ordinance. If we make it part of the application process, it would be the applicant's responsibility to submit and fill that out appropriately. Now, if they invite a county staff person to come out and help them, that is fairly commonplace, also.

Danny stated again, it is an excellent tool if we have a half-way accurate and consistent scoring process.

Russ agreed.

Adam stated he could look at Soil and Water staff to do these assessments but would have to make sure we have the capacity to do that.

Larry asked if we could condense this at all.

Adam stated he would have to have a discussion with Deja on that, however, if you look at what it was designed for in the first place, it meets that goal.

Ken, the commissioners haven't seen this yet.

Adam stated Deja has presented it to them briefly.

Ken, so you've only taken it to the attorney, so far.

Adam, correct, and back here for discussion and then go from there.

The board all agreed to keep moving forward and get this utilized for our variance process.

Ken moved to adjourn, seconded by Bill, voice vote, no dissent heard, motion carried to adjourn at 7:46 pm.

## Minutes of the Todd County Board of Adjustment Meeting

January 22, 2026

Completed by: Sue Bertrand P&Z Staff

Site visit completed for US Solar by Adam Ossefoort and Ken Hovet on 12/15/2025  
Site Visit completed for Peterson by Adam Ossefoort and Danny Peyton on 1/13/2026.

Meeting attended by board members: Vice Chair Bill Berscheit, Danny Payton, alternate Larry Bebus and Planning Commission Liaison Ken Hovet.

Staff members: Adam Ossefoort and Sue Bertrand

Other members of the public: Sign-in Sheet is available for viewing upon request.

Bill called the meeting to order at 6:00 p.m. Each board member introduced themselves and Bill explained the process for those attending, and the Pledge of Allegiance was recited.

### **AGENDA ITEM 1: Reorganization of the Board and review of Business Rules**

#### **Chair**

Larry nominated Russ, seconded by Danny, no other nominations, voice vote, no dissent heard, motion carried.

#### **Vice Chair**

Larry nominated Bill, seconded by Ken, no other nominations, voice vote, no dissent heard, motion carried.

Dan motioned to adopt the rules as presented for 2026, Larry seconded, voice vote, no dissent heard, motion carried.

### **AGENDA ITEM 2: USS Eagle Bend Solar, LLC – PID 28-0001100 – Wykeham Township**

Request(s):

1. Request to remove the prime farmland solar restriction from Section 9.20 to allow for the submission of a CUP application for a 10-megawatt solar energy system in AF-1 Zoning District.

Tena Munson, Senior Vice President Project Developer at US/Solar, were present as the applicant.

Staff Findings: Adam stated he has no additional information for the staff report. The staff report is available for viewing upon request in the Planning & Zoning Office.

Proposed Condition(s):

1. Proposed project must be constructed in compliance with Section 9.20 of the Todd County Planning and Zoning Ordinance.
2. Variance shall lapse and be void if not substantially completed within 36 months from the granting of this variance in compliance with Section 5.03G of the Todd County Planning and Zoning Ordinance.
3. Applicant shall abide by all other applicable federal, state, and local standards.

Tena Monson, with US Solar, headquartered here, in Minnesota, stated the landowner was present and would like to read her prepared remarks. Tena stated the question she has come up with is what is "Prime farmland"

and how this board defines it. She clarified this is not a policy setting board as that is the Commissioners. They allow the use per: CUP within this district. Of course, they have put in the protections that are important, which are of course, one of the things we are discussing here this evening. Not reviewing the project as a whole, as that is what the Planning Commission will do. We reflect on this discussion here as what is Prime farmland, and how you define it? The last time they were here, they talked about Prime farmland as defined by the USDA in categories and referred to the map handouts the board had to review. She did not feel the maps told the whole story. She wanted to share her yield (Greenwaldt) that does not reflect prime farmland. Her yield is around 125 bushels of corn and the average for the County is 210. The way they think about it, on a project-to-project basis, this board can look at the actual productivity of the property to understand whether they are, in fact, taking highly productive farm land out of rotation or is it finding a better and higher use for land that may not be as productive as the definition of the USDA would lead us to believe. Unfortunately, she does not have data maps to report data yield on neighboring properties. She stated they do not believe, in this case, that this is indeed prime farmland. She thought the board could define prime farmland based by yield, if they so choose. She mentioned they had talked about using a pollinator mix, which is a meadow type mix, with benefits that reduce run-off and erosion control, but they are also proposing to add sheep grazing. US is really big on using Agrivoltaics, a mix of more traditional farming, together with the farming of the sun, to produce locally generated power. She stated they are happy to use the sheep, as they manage the growth of the pollinator mix. Part of traditional agricultural use on site. She would like to discuss/present to the board the replication of a project they have in Big Lake, MN. That project has vegetable crops in between the panels. They have a great partnership with Big River Farms as part of a match maker for farmers looking for land, and they can pair them with their solar facility. They have great success in growing their crops there, and they have a chef that will grow and take products from there to prepare dishes for people when they hold events there. She stated it is quite amazing what they are doing there. It is really hard to do, but they are committed to figure out how to do that here. It would not be for the full acreage, but there are usually not enough farmers in the area that could take that much acreage, but they are committed to doing a portion of it. So, they think, between looking at yields and having an applicant bring forward Agrivoltaics in some capacity, that this variance can be approved. A couple of the other benefits; they have gone in front of the township, and they are in support of this project. The township mentioned property rights, and she states the importance of the people most locally involved, and from the governments' perspective, supporting this project. From the last meeting, there is no one in opposition to this, and tonight, could be potentially one, here, but we are not aware of any opposition. Everyone has been noticed and the landowner has been here for decades and knows all her neighbors. This is a very well-sited project. We don't have neighbors and we are in a place where we are not impacting peoples' lives, but the landowner who will be right next to this, and she is here tonight, working with them. This board is tasked with defining Prime farmland. She stated they believe they have a very well supported project on what they would call low productivity land. We have a landowner that is a part of this community, and they have a deep willingness to incorporate more traditional farming practices onto the site which they welcome as a condition for the site if so needed. An extra perk, it is a locally produced power. We know electricity is in short supply and if you can get power locally, that is always a great story to have. She drew attention to the maps again and stated they have overlaid all of the constraints that they would typically remove; USDA Prime farmland, wetlands and waterways, shoreland buffer zones, unsuitable slopes, tree cover, infrastructure and MN Power service territory. Referred to the black and gold map, which is the opposite of the other map on where you could possibly put solar. They didn't go site by site. She stated they look first at why they wouldn't go there (a lot of infrastructure and investments, pivots), then why they would. They try to avoid a view shed to a "natural environment" like a river. What is really clear, is the limited

supply side of where they could put these. The demand side is that MN Power wants solar power and this is USS Eagle Bend Solar's one time. In her professional and industrial opinion, MN Power's service area is so large, there will not be high demand for projects in Todd County.

More discussion on maps.

Site visit review done by Ken. Stated it was, for the most part, unremarkable and was mainly flat area with a slight slope to the South. He noticed corn stubble under the snow. This report may be viewed fully upon request at the Planning and Zoning office.

Correspondence received: Adam stated none, as the homeowner would like to read her own correspondence.

Public comment:

Jean read a prepared letter to the board for the record. This letter may be viewed in full in the Planning and Zoning office upon request.

Board discussion:

Bill asked about the yield per acre and average.

Tena, 124 bushels per acre for corn and the county average is 210.

Ken asked Jean if she knew what the productivity index is for that piece of land? It would be anywhere between 0-100. A University of MN method of measuring productivity.

Jean stated she was not familiar with this.

Danny stated relating to tax bases, he has heard from both sides, will increase the tax base and so forth, and it will be an ongoing improvement for the Township and County. If this is always positive, why are we always hearing the problems around the Twin Cities and our Western counties and states where they have almost no people doing ok. He has a problem with the tax base statement as "we increase the tax base, the increased profitability" and the more people we have, the more problems we have, and we are always short of money. He has always had trouble with the tax-base statement. As far as the Ordinance, he believes the Board of Adjustment is here to offer relief from the strict enforcement of the Ordinance and he believes they are also here to interpret what the Ordinance is trying to tell us. As far as changing the laws, goes back to the commissioners. He does not want to get into a fight over the Ordinance with the County commissioners. We can suggest to the County Commissioners, they make the Ordinance and Adam goes there, he does not want to get into the politics. As far as the assets of farming on your income and so forth, Danny stated he farms too. He looked around and he sees different pieces of land and how they are farmed, and he sees both extremes as far as 100% managed where it is perfect time planting, perfect time fertilizing and yes, it is always a factor. He also has neighbors that have never sprayed, ever in their life, and it is full of weeds. He fights weeds that blow onto his fields, and it's the same soil texture. How can he compare one to the other? One side is raising quite a bit more bushels than the other side of the fence, with the same soil. He does not want to get into what

category of farming is being done on this property. Having a hard time with that, too. It gets back to why we are here and why we are having trouble with this whole concept of having no prime farmland. He could see easier if it is a little bit here or a little bit there, but the last time he checked this property is over 50% in prime farmland. He can see the road going in or the area where we want to put most of the electronic voltage ramp up to the power grid.

Bill offered sub-station.

Danny continued, the substation up by the solar-panels, and he can see, this project is going on over 50% of this classified as prime farmland. This is where he is having great trouble with it.

Bill stated the last time we asked the applicants for saturation within the County, and cudos to you guys for providing the maps, coupled with the information regarding MN Power, it clearly tells us that the times we are going to have a request like this come before the board is going to very minimal. This is not an "opening the floodgates" situation. He can attest to that personally. He, himself, has been approached 4 or 5 times for solar projects and so far, they have all fallen away. Bill stated he has expressed this with the commissioners, last October, and voiced to them he feels if we don't accept the placement of these things where we don't have to worry about it being aesthetically pleasing (not putting them right tight up against town, where everyone will have to look at the sun beating off of them the first thing in the morning) they will have to see more applications that do not fit the parameter and it gets less desirable. Bill stated the project he has before him, personally, he would have some de-forestation involved, and he feels it is not something that should be done to make way for solar. It makes sense these projects are put on the more logical real estate, where they best fit.

Tena shared statistics on Todd County (627,000 acres) with 2.8% where the solar is allowed, not doing a site-specific review, areas like where irrigators are, or farmed but incredibly wet, too close to homes or the highway as more industrial uses are a better fit.

Bill added, where solar would fit, where the grid would allow it to fit.

Larry asked, as far as the character of the locality, these panels are 6-8 feet high, is there all farmland around it or are neighbors going to think it is an eyesore?

Tena stated we don't have the impacts (noise, don't draw people to the site, we are not stressing your schools, we don't need sewer or water) other than visuals, and ordinance covers this by screening, the closest home is the landowner, and she will have the only visual impact. The best way to reduce this impact is distance, which they are doing, and if you need trees around the roadway or full perimeter, they would be fine with either condition. It is a well-situated site.

Larry, how long will it take to install the panels?

Tena, equivalent to a one construction project, from spring, after road restrictions, we put in the road, until fall. Sometimes they straddle winter.

Larry, will that interfere with the area farming activity like planting and harvesting?

Tena stated no, typically, the solar is impacted more from farmers' dust. Road use maintenance agreements are common with local officials like townships, and US Solar will survey the condition of the road before they do anything and after, and will restore the road to its' original condition or better. She stated this is a small project so there should not be too many trucks. Impacts are limited.

Bill added it is only a mile off Hwy 71.

Danny, refresh us, why is the limitation from the three-phase power line only a mile?

Tena, economics, in terms of proximity to infrastructure.

Tena stated you want to be as close to the infrastructure as possible, there are also thermal impacts, and they look at all the things that could go wrong. The further away from the infrastructure, the more problems can occur. The further away you are, the more you have to shrink your project, so you don't have those impacts.

Bill stated this is not MN Power putting in this proposed project, this is small privately owned groups that have to sell this to MN Power. If it doesn't make MN Power money or tightens that margin down, MN Power absolutely will not accept the application if the economics don't work.

Tena added MN Power has to procure a certain number of megawatts within their service territory. The opportunity could be with Todd County or, they go to the neighboring county.

Bill added as tax payors, we are already paying for solar so, do we want it to come back to us?

Larry asked, if bushels per acre are going down, due to being too wet for the homeowner, how will that affect the panels?

Tena explained why wet ground is not a problem for the construction of the project, providing there is no muck on site.

Ken asked, where you talk about 18,000 acres where solar is allowed, are you talking inside MN Power's service area?

Tena, correct, and explained. She also added it does not include co-ops as the demand is low for co-ops.

Ken, how far is too far out?

Tena, we would never go more than three miles.

Ken reminded Tena the board had asked if there was an alternative site.

Discussion on alternate site.

Tena stated, you asking for an alternative site asks them to abandon the landowner. If the board tells us no, we will go find another county. She stated she cannot recommend investing the millions of dollars we make in these projects, including over ten million dollars, closer to fifteen million dollars with capital expenditures into a county that has already told us they don't... not here. Whether prime farmland or not, she would just go to a different county.

Ken stated one of the considerations of this board, for every variance asked for: is there an alternative site, so we don't need the variance, and he doesn't see that anyone has looked yet.

More discussion on alternative sites.

Bill, with his experience, having been through numerous of these, he is absolutely aware that multiple of his neighbors were approached when he was approached, and almost always they declined. He can think of one other, out of five projects, was one neighbor who put his property up as a potential. When these things get initiated, there is something generated like this (holding up the maps) that shows the potential and the return on investment, so, then the landowners are approached and most decline. Very few are willing to come to the table and have this conversation. Bill stated, in his mind, have we explored alternative sites? Yes, and to back it up one step further, through the last twenty years, he has thrown out fifty to one hundred post cards of companies looking to put solar on our real estate, so the approach is constantly there but it's incredibly limited for the people willing to come to the table. Are alternate sites considered? Absolutely, and felt it was unfair to put it on the applicant, and ask "what is your alternative site", when there simply isn't one.

Ken stated, again, they haven't been out there looking or talked to the land owners.

Tena defended, they send hundreds of letters, postcards and ask people to reach out to them. They also do targeted phone calls, particularly in high value locations, next to substations. When you sign someone, you sign someone. You don't keep signing people. She also added she thinks this is a great site because there are no impacts. She didn't think you could get a site better than what they have put together.

Bill added, as an FYI, once the landowner is approached, they come in and immediately ask for a contract and they put money up, and he is certain Jean has cashed a check or two, like they have done with Bill repeatedly over the years, and once you have taken that step, they are contractually obligated and don't go with some other company. At that point, they are not opening it up to other options at the table. All this was sorted out before the contract was signed, and before they got to this point.

Danny understood the alternate site is limited to Jean's parcel, and it wouldn't make a difference, in her case.

Luke stated they have a site selection team that sends out dozens to hundreds of letters and the response rate is quite low, in the 10% to 15% and you need a willing landowner. There was a letter batch that went out to the Eagle Bend area and Jean's parcel is what they have come up with.

Larry asked what the life span of a panel was.

Tena, 40 plus years, after 25 to 35 years they degrade.

Larry, then what?

Tena, decommissioning or take it down, then return it back to usable soils at the end of it, so if you think about housing or a lot of other developments, there are not a lot of times that that is true. Many Counties view this as an interim use. There is also the potential for repowering, where you switch out the panels and work with higher power panels.

Larry, whose responsibility is it to decommission and whose responsibility is it to get rid of these things?

Tena stated they have within their leases with landowners an agreement where US Solar would have to decommission it, also Todd County Ordinance requires some sort of bond or security if US Solar does not take care of it.

Larry, so after 25 years, you take it all out, then, this prime soil is still usable as prime soil?

Tena, absolutely. She added she will argue the yield would be a lot better, too.

Bill added he was informed the panels have enough value to be recycled and there are places for that.

Bill asked if they would like to go over criteria?

Ken, let's move to criteria questions.

<b>Criteria Question #1: Is the variance in harmony with the general purposes and intent of the official control?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Dan Peyton	Yes
Larry Bebus	Yes
Ken Hovet	No
Bill Berscheit	Yes, it is addressed in the ordinance and provides a practical difficulty for it.

Majority response- yes

<b>Criteria Question #2: Is the variance request consistent with the goals and policies of the comprehensive plan?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Dan Peyton	Yes
Larry Bebus	Yes
Ken Hovet	Yes
Bill Berscheit	Yes, our Comp plan clearly addresses solar and a desire to place it although the placement criteria are stringent.

Majority response- yes

<b>Criteria Question #3: Is the property owner proposing to use the property in a reasonable manner not permitted by an official control?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Dan Peyton	Yes
Larry Bebus	Yes
Ken Hovet	Yes

<b>Criteria Question #3: Is the property owner proposing to use the property in a reasonable manner not permitted by an official control?</b>	
Bill Berscheit	Yes

Majority response- yes

<b>Criteria Question #4: Is the need for a variance due to the circumstances unique to the property not created by the landowner?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Dan Peyton	Yes
Bill Berscheit	Yes
Ken Hovet	Yes
Larry Bebus	Yes

Majority response- yes

<b>Criteria Question #5: Will the variance maintain the essential character of the locality?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Dan Peyton	No, farming is something that is grown to consume, beef, sheep, poultry, grain, vegetables, however, there is corn grown and put in vehicles, so he's having trouble with this.
Bill Berscheit	Yes, we have no commercial solar in Todd County. Sellers refer to it as a solar farm. The reality is the use of a piece of agricultural real estate that will be opened up to a use that will be exactly the same as it is now, at the end of its term use, and added it is impacted far less than a turkey barn or numerous ag structures or non-ag structures that may be put on this land over multiple generations.
Ken Hovet	No, it is going to look completely different than what is there.
Larry Bebus	Yes, agrees with Bill.

Majority response- split

<b>Criteria Question #6: Does the need for the variance involve more than just economic considerations?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Dan Peyton	No, economics only.
Bill Berscheit	Yes, hardest questions, we can change topography by economics, in this case it is about location, location, location, yes, driven by economics, but there are more considerations, even if this is prime farmland, we do have reasons to grant a variance to move forward
Ken Hovet	No, that is all he heard was economic considerations.
Larry Bebus	Yes, involves infrastructure, farmland, economics, everything.

Majority response- split

<b>Criteria Question #7: Have safety and environmental concerns been adequately addressed?</b>	
<b>Board Member</b>	<b>Vote and Comments</b>
Dan Peyton	Yes.
Bill Berscheit	Yes, conditions will address weed control maintenance.
Ken Hovet	Yes, weed control is the biggest concern, no safety concerns, conditions can address the weeds.
Larry Bebus	Yes.

Majority response-Yes

Summary of criteria question majority responses as follows:

#1	Yes
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#2	Yes
#3	Yes
#4	Yes
#5	split
#6	split
#7	Yes

Ken made the motion to deny, based on our requirements set forth in the top paragraph.

Larry asked if we could bring it forward next month?

Bill stated we have an even board this evening with a two-on-two vote. In the criteria questions, there are two that we do not have a majority in. When it comes to a vote, in regards to a motion, that would be a failure. He assumed that is the same for the criteria questions or is that an affirmative vote?

Adam stated the criteria questions are just for discussion. They are there to help establish your findings for making a decision. The motion is what matters in the end. So, each individual member should vote on their individual criteria. He has the statute available in the event there is a tie vote.

Bill stated we have a motion for denial, do we have a second, no second, motion for denial fails. Open to discussion and/or another motion.

Danny made a motion to approve with a weed control condition. He asked what has been decided for under the panels?

Tena stated they are proposing pollinator mix controlled by sheep grazing and they are open to vegetable farming if the board would like them to look at that. The vegetable farming will most likely happen outside of the sheep fence, if the board would like to see a more traditional use for the land, so three; pollinator, sheep and vegetable farming outside the fence).

Danny stated he is also in the pollinator program and lately, the state is pushing pollinators, but there is an annual seeding program that he is in. Each year he must plant. Not sure that is what they are planning.

Tena stated they plant once and it takes three years to establish.

Danny requested, in this pollinator's mix, could we have at least twelve varieties?

Ken asked for a friendly amendment to the conditions, and he asked for weed control as he has seen way too many industrial sites that are just a big weed garden. He would also like to see tree planting for screening.

Tena stated the conditions are reasonable, in terms of screening, however, they have a handful of trees. They like red cedars, but asked for a little flexibility with choosing the type, as they can only commit to the height right now, to make sure they are planting the right trees in the right soil, for successful growth.

Ken agreed, 12' to start with.

Bill had Adam add a condition for screening.

Bill asked for a second, and Larry seconded with the five conditions as presented.  
Conditions:

1. Proposed project must be constructed in compliance with Section 9.20 of the Todd County Planning and Zoning Ordinance.
2. Variance shall lapse and be void if not substantially completed within 36 months from the granting of this variance in compliance with Section 5.03G of the Todd County Planning and Zoning Ordinance.
3. Applicant shall plant a pollinator seed mix consisting of no less than 12 different species of plants. Weeds shall be controlled at all times.
4. Vegetative screening shall consist of trees that will reach no less than 12' in height at full maturity.
5. Applicant shall abide by all other applicable federal, state, and local standards.

Roll call vote commenced as follows:

Board member	Vote (yes or no)
Danny Peyton	yes
Ken Hovet	no
Larry Bebus	yes
Bill Berscheit	yes

Motion carried, variance granted.

**AGENDA ITEM 3: Luke Peterson – PID 06-003600 – Burnhamville Township**

Request(s):

1. Request to reduce the side yard property line setback from 30' to 16.9' in AF-1 Zoning District.

Staff Findings: Adam read the staff report. The staff report is available for viewing upon request in the Planning & Zoning Office.

Proposed Condition(s) if approved:

1. No conditions

Luke confirmed the staff report was accurate.

Danny went through his site visit report. This report may be viewed in full upon request at the Planning and Zoning office.

Correspondence received: none

Public comment: none

Luke stated the reason it's where it is: he can't chase the pheasants out of one barn into another unless they are under a roof, or they are gone.

Board discussion:

Ken, are both barns the same?

Luke, one is galvanized, one is not, both pole sheds.

Danny stated he noticed this is for housing the pheasants, it is ventilated, is there any water in the structure?

Luke. There will be in the spring, and only through the summer.

Dan, it's about the cheapest you can build the structure, with galvanized siding and roof.

Luke, the goal is when they come in this starter barn, when they get to be 5 or 6 weeks, this is a wild animal, so they don't have a chance to get used to the environment. Last year, when they had a lot of heavy rains, he lost a lot of birds, when they first went outside. The idea is: this would alleviate that.

Danny, one of the images shows a layout of the runs, who owns what land?

Discussion on who owns neighboring lands.

Bill asked if there has been any attempt to do a property line adjustment to alleviate the need for a variance?

Adam stated the property line cannot change, due to it being a section line.

Ken made a motion to approve.

Bill stated a motion to approve with findings of facts: this is a family operation that operates across property lines but the property line in question is a section line and therefore would still be considered a property line even if he owned across it.

Larry seconded.

Roll call vote commenced as follows:

<b>Board member</b>	<b>Vote (yes or no)</b>
Danny Peyton	yes
Ken Hovet	yes
Larry Bebus	yes
Bill Berscheit	yes

Motion carried, variance granted.

Adam announced he had brought the Earth program, as part of our Ordinance amendment to make it a part of our application to the commissioners, last Tuesday's work session and they didn't really move forward with it at all, but they want to have Adam come back to an upcoming work session, and bring one or two board members, to discuss your vision of using it. Adam was hoping Ken would be one, as he is the crossover member, but you may want another to come, if anyone is interested, and he doesn't need an answer right now, just saying that is the next step, is we will go back to the work session and bring one or two board members with him.

Dan motioned to adjourn and Ken seconded. Voice vote to adjourn. No dissent heard. Motion carried, and the meeting adjourned at 7:41 PM.

DRAFT



WHERE THE FOREST MEETS THE PRAIRIE

**Todd County**

MINNESOTA • EST. 1855

Received

JAN 23 2026

Todd County Planning & Zoning

PLANNING & ZONING  
215 1st Avenue South, Suite 103  
Long Prairie, MN 56347  
Phone: 320-732-4420 Fax: 320-732-4803  
Email: [ToddPlan.Zone@Co.Todd.MN.US](mailto:ToddPlan.Zone@Co.Todd.MN.US)

Accepted 1/20/2026  
KLM

**Appeal for a Variance**

Applicant Matthew Parker  
Mailing Address 11899 Bluegill Dr. Sauk Centre MN 56378  
Site Address 11899 Bluegill Dr. Sauk Centre MN 56378  
Phone Number \_\_\_\_\_ Cell Number [REDACTED]  
E-Mail Address [REDACTED]  
Property Owners Name & Address (if not applicant) \_\_\_\_\_

Parcel Number(s) 03-0072000  
Section: 19 Township Birchdale

Zoning District (circle one): AF-1; AF-2; R-10; R-2; UG; RT; Commercial; Industry; or  
Shoreland (Lake or River Name): Long Lake (Natural Environment)

Full and Current Legal Description(s): Lot 6, Block 1, Birch Terrace Addition  
(attach if necessary)

Do you own land adjacent to this parcel(s) \_\_\_\_\_ Yes  No

Septic System: Date installed 1979 Date of Compliance Inspection 10-8-25

Is a new system needed:  yes \_\_\_\_\_ no \_\_\_\_\_ STS Design attached \_\_\_\_\_

Required for applications with existing septic systems: Approved design submitted for new system to be installed, new system installed within previous 5 years, or passing compliance inspection on existing system in previous 3 years

**Variations Requested:**

What standards or requirements are you unable to maintain? (Check all that apply)

Lot width \_\_\_\_\_ Lot area \_\_\_\_\_ Lake or River setback  Bluff setback \_\_\_\_\_  
Road right-of-way setback \_\_\_\_\_ Side Yard setback \_\_\_\_\_ Buildable area \_\_\_\_\_  
Impervious surface coverage \_\_\_\_\_ Building/Structure Height  Other \_\_\_\_\_

**Did you meet with the Township Board to present the Application for Variance?**

Yes  No \_\_\_\_\_ Date of the meeting 1/27/26

[Signature]  
Optional Township Board Signature

Chair  
Board Position

**LIST YOUR VARIANCE REQUEST(s)** and what, if the variance were granted, you intend to build or use the land for. **For example:** "Request to reduce the 10ft structural setback from my west side lot line to 8ft for the construction of a detached garage to be used for vehicle and personal storage."

- 1.) Request to add a 13'x36' addition on east side of house in order to move the primary bedroom + bathroom down to the main level. 90.3' from OHW
- 2.) Request to add 26 1/2'x38' attached garage to the west side of the house for vehicle storage. 90.3' from OHW
- 3.) Request to increase the height restriction of the house from. Current height 21', request 28'
- 4.)

**\*\*State Statutes Section 394.7 Subd7: Variances: Practical Difficulties.** The BOA shall have the exclusive power to order the issuance of variances from the requirements of any official control including restrictions placed on nonconformities. Variances shall only be permitted when they are in harmony with the general purposes and intent of official control, and when variances are consistent with the comprehensive plan. Variances may be granted when the applicant for the variance establishes that there are practical difficulties in complying with official rules; the plight of the landowner is due to circumstances unique to the property not created by the landowner; and the variance, if granted, will not alter the essential character of the locality. Economic considerations alone do not constitute practical difficulties.

The Board of Adjustment may impose conditions in the granting of a variance. A condition must be directly related to and must bear a rough proportionality to the impact created by the variance.

**EXPLAIN YOUR PRACTICAL DIFFICULTIES\*\* or reason why you need your request approved.**

Currently our home is 2 stories with 4 sets of stairs. All requests are in an effort to make the majority of the home single-level living. This will allow us to stay in our home as long as possible as we grow older.

It is important that you flag your related property lines and proposed building locations

Have you flagged your lot? () (N)

# SKETCH DRAWING

See attached drawing

The applicant or agent hereby makes application for a variance agreeing to do all such work in accordance with all Todd County Ordinances. Applicant or agent agrees that site plan, sketches, and other attachments submitted herewith are true and accurate. Applicant or agent agrees that, in making application for a variance grants permission to Todd County, at reasonable times during the application process and thereafter, to enter applicant's premises to determine the feasibility of granting said variance or for compliance of that application with any applicable county, state, or federal ordinances or statutes. If any of the information provided by the applicant in his/her application is alter found or determined by the county to be inaccurate, the County may revoke the variance based upon the supply of inaccurate information.

**If the applicant is not the property owner, both signatures are required below.**

Matthew Parker  
Applicant Name Printed

*Matthew Parker*  
Signature

1-26-26  
Date

\_\_\_\_\_  
Property Owner Name Printed

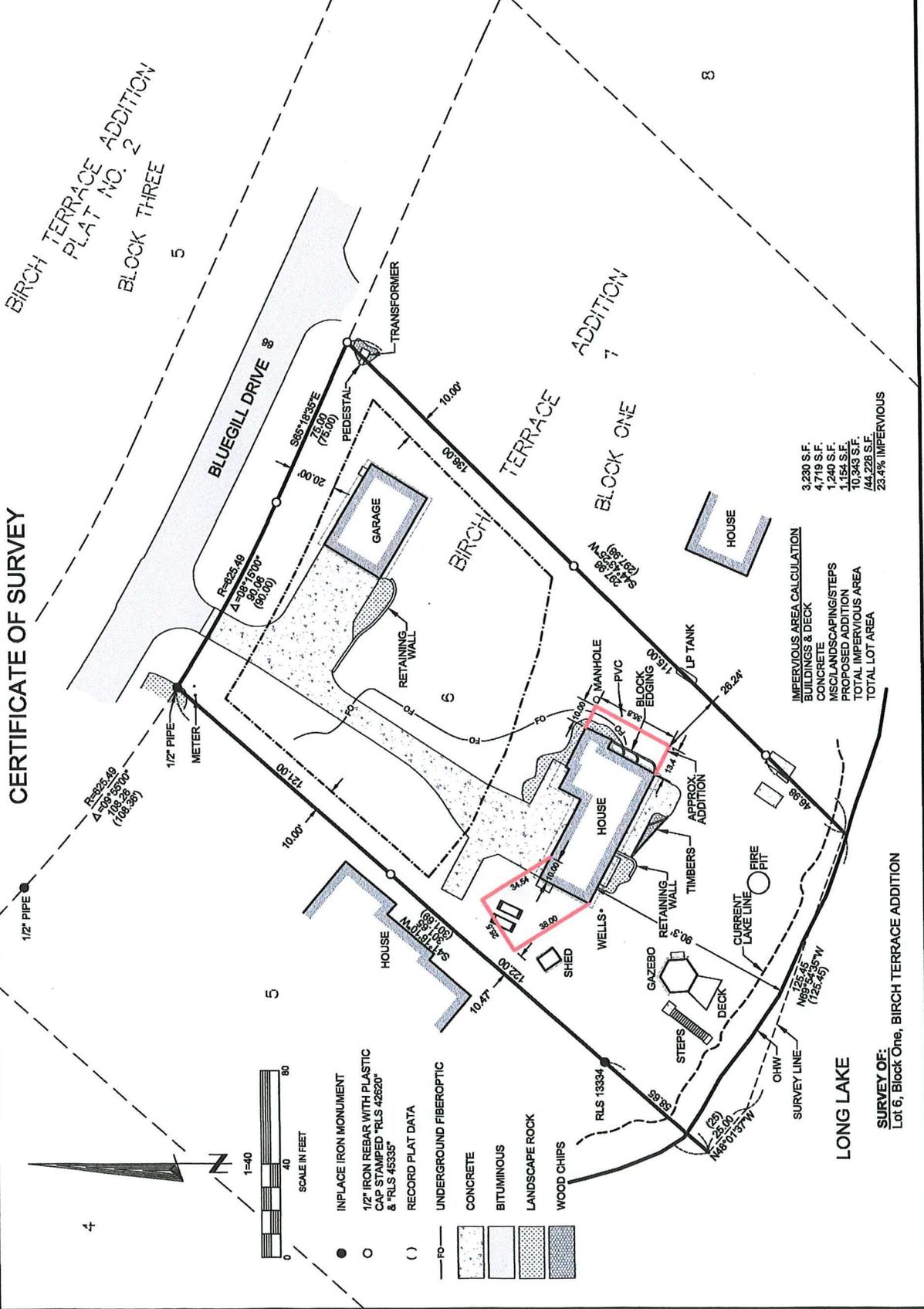
\_\_\_\_\_  
Signature (If different than applicant)

\_\_\_\_\_  
Date

DATE: 10/8/2025 • DRAWN BY: JSM • CHECKED: BMN • JOB NO. 12629  
 REQUESTED BY: MATT PARKER  
 509 22ND AVE. EAST, SUITE 101  
 ALEXANDRIA, MINNESOTA 56308  
 PH. (320) 762-4111  
 www.nybergsurveying.com

Brad M. Nyberg  
 License No. 42620  
 Date: October 8th, 2025  
 I hereby certify that this survey, plan or report was prepared by me or under my direct supervision and that I am a duly Registered Land Surveyor under the laws of the State of Minnesota.

SEC. 19 T 127 N R 33 W



CERTIFICATE OF SURVEY

BIRCH TERRACE ADDITION  
 PLAT NO. 2  
 BLOCK THREE

BIRCH TERRACE  
 ADDITION  
 BLOCK ONE

IMPERVIOUS AREA CALCULATION

BUILDINGS & DECK	3,230 S.F.
CONCRETE	4,719 S.F.
MSC LANDSCAPING/STEPS	1,240 S.F.
PROPOSED ADDITION	1,154 S.F.
TOTAL IMPERVIOUS AREA	10,343 S.F.
TOTAL LOT AREA	44,228 S.F.
	23.4% IMPERVIOUS

- INPLACE IRON MONUMENT
- 1/2" IRON REBAR WITH PLASTIC CAP STAMPED "RLS 42620" & "RLS 46335"
- ( ) RECORD PLAT DATA
- FO UNDERGROUND FIBEROPTIC
- CONCRETE
- BITUMINOUS
- LANDSCAPE ROCK
- WOOD CHIPS

SCALE IN FEET  
 1"=40'  
 0 40 80



SURVEY OF:  
 Lot 6, Block One, BIRCH TERRACE ADDITION

# IMPERVIOUS SURFACE WORKSHEET (FOR SHORELAND ONLY)

## APPLICANT INFORMATION

Name Matthew Parker Site Address 11899 Bluegill Dr.  
 Phone [REDACTED] City Sauk Centre State MN Zip 56378  
 Mailing Address 11899 Bluegill Dr Parcel Number -  
Sauk Centre MN 56378 Lake/River Name \_\_\_\_\_

**IMPERVIOUS SURFACE:** is a constructed hard surface that either prevents or retards the entry of water into the soil or causes water to run off the surface in greater quantities & at an increased rate of flow than prior to development.

## LOT/STRUCTURE DIMENSIONS

Total lot area: 44,228 sq ft

List all structures (structure's foundation footprint: length, width, and total area)

Existing	Proposed
1. <u>House</u>	<u>Attached Garage</u>
2. <u>Detached Garage</u> } 3230 sq ft	<u>Primary bed / bath</u> } 1154 sq ft
3. <u>Garden Shed</u>	
4. <u>Bazebo</u>	
5.	
6.	
7.	
8.	

List all non-roofed hard surfaces: Examples include sidewalks, paver stones, retaining walls, patios, decks, driveways & parking areas (asphalt, concrete or gravel), and areas of landscaping underlain with plastic or other impervious liners:

Existing	Proposed
1. <u>Driveway / Patios</u> 4719 sq ft	
2. <u>Misc Landscaping / Steps</u> 1240 sq ft	
3.	
4.	
5.	
6.	
7.	
8.	

**Total of 25% of lot may be covered by impervious surfaces (15% of which are from roofed structures)**

1. List in the table below any efforts by landowner to reduce project impact by removing or reducing impervious surfaces.

List Structure or Impervious Surface to Be removed	Square footage to be removed	Location of structure or impervious surface to be removed (see table below)
Example: concrete drive to lake	8' x 35' = 280 sq ft	(C) Within Impact Zone
Garden shed	49 sq ft	B
Planters	2 @ 42 sq ft = 84 sq ft	B

Location of variance request in reference to Ordinary High Water level	General Development Lake	Recreational Development Lake	Natural Environment Lake and Rivers / Streams
A. Outside shoreland building setback	75'+	100'+	150' +
B. Between Shore Impact Zone and Building Setback	37.5' to 75'	50' to 100'	75' to 150'
C. Within Shore Impact Zone	0 to 37.5'	0 to 50'	0 to 75'

2. List below any Storm Water Management Best Management Practices (BMP's) that will be installed to help mitigate impacts of development.

INFILTRATION BMP's

List any measures you plan on taking to increase water infiltration and retention. Examples include rain gutters, rain gardens, retention swales, berms, sub-surface tile, etc. Efforts to install BMP's will be graded positively in the site evaluation. Locate projects on site map.

Rain gutters on house and shed will be installed

VEGETATION BMP's

Vegetation planting along lake shore areas is also a Best Management Practice. Planting areas of your lakeshore impact zone with permanent vegetation helps infiltrate water, reduce lake impact, provide habitat, and screen the dwelling from other lake users. Plantings are graded positively in the site evaluation. List any areas to be planted or restored and mark the location on your site map.

Adding some tree's to the property not sure on location yet



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, 2023

Todd County  
MINNESOTA



Todd County GIS  
215 1st Ave S, Ste 102  
Long Prairie, MN 56347  
(Office) 320-732-4248

**GIS Site Map**



The Todd County GIS & Land Services Department has made every effort to provide the most accurate and up-to-date information available in this publication and cannot be held responsible for any unforeseen errors or omissions. If the recipient wishes to locate parcel corners and property lines, employ the services of a Registered Land Surveyor.

Printed on:  
Monday, February 2, 2020



WHERE THE FOREST MEETS THE PRAIRIE

**Todd County**  
• MINNESOTA • EST. 1855 •

Received

FEB 02 2026

Todd County Planning  
& Zoning

Phone: 320-732-4420 Fax: 320-732-4803  
Email: ToddPlan.Zone@Co.Todd.MN.US

PLANNING & ZONING  
215 1st Avenue South, Suite 103  
Long Prairie, MN 56347

Accepted 2/2/2026  
KLM

**Appeal for a Variance**

Applicant Stephen Neville  
Mailing Address 30139 122nd Street Corey Eagle, MN 56336  
Site Address Same  
Phone Number [REDACTED]  
E-Mail Address [REDACTED]  
Property Owners Name & Address (if not applicant) \_\_\_\_\_

Parcel Number(s) Property I.D. 11-00460000 Tax ID. 32530

Section: \_\_\_\_\_ Township Corey Eagle

Zoning District (circle one): AF-1; AF-2; R-10; R-2; UG; RT; Commercial; Industry; or

Shoreland (Lake or River Name): Sliters Beach (20-127-32) Lot 8 west 10  
Full and Current Legal Description(s): Foot Lot 9 BLK 1

(attach if necessary)

Do you own land adjacent to this parcel(s)  Yes  No

Septic System: Date installed \_\_\_\_\_ Date of Compliance Inspection 1/13/26

Is a new system needed:  yes  no  STS Design attached

Required for applications with existing septic systems: Approved design submitted for new system to be installed, new system installed within previous 5 years, or passing compliance inspection on existing system in previous 3 years

**Variations Requested:**

What standards or requirements are you unable to maintain? (Check all that apply)

Lot width 43<sup>ft</sup> Lot area \_\_\_\_\_ Lake or River setback \_\_\_\_\_ Bluff setback \_\_\_\_\_  
Road right-of-way setback \_\_\_\_\_ Side Yard setback \_\_\_\_\_ Buildable area \_\_\_\_\_  
Impervious surface coverage  Building/Structure Height \_\_\_\_\_ Other \_\_\_\_\_

**Did you meet with the Township Board to present the Application for Variance?**

Yes  No  Date of the meeting 9/8/25

Michael Rabe

Optional Township Board Signature

Chairman

Board Position

**LIST YOUR VARIANCE REQUEST(s)** and what, if the variance were granted, you intend to build or use the land for. **For example:** "Request to reduce the 10ft structural setback from my west side lot line to 8ft for the construction of a detached garage to be used for vehicle and personal storage."

- 1.) Request to exceed roof structure limits from current 20% to 22.7% - From 1755 sq. ft. to 1960 sq. feet and
- 2.) eliminate various impervious plots by 9.35% with a remodel and addition to back of house 10 feet.
- 3.)
- 4.)

**\*\*State Statutes Section 394.7 Subd7: Variances: Practical Difficulties.** The BOA shall have the exclusive power to order the issuance of variances from the requirements of any official control including restrictions placed on nonconformities. Variances shall only be permitted when they are in harmony with the general purposes and intent of official control, and when variances are consistent with the comprehensive plan. Variances may be granted when the applicant for the variance establishes that there are practical difficulties in complying with official rules; the plight of the landowner is due to circumstances unique to the property not created by the landowner; and the variance, if granted, will not alter the essential character of the locality. Economic considerations alone do not constitute practical difficulties.

The Board of Adjustment may impose conditions in the granting of a variance. A condition must be directly related to and must bear a rough proportionality to the impact created by the variance.

**EXPLAIN YOUR PRACTICAL DIFFICULTIES\*\* or reason why you need your request approved.**

Small lot size. would like storm shelter in house perimeter - not on side of house - also need a garage for 1 car.

It is important that you flag your related property lines and proposed building locations

**Have you flagged your lot? ( Y ) ( N )**

**GREY EAGLE TOWNSHIP BOARD**

212 East State Street

Grey Eagle, MN 56336

**Date:** September 8th, 2025

**To Whom It May Concern:**

On this 8<sup>th</sup> day of September, 2025, the following property owners:

**Stephen Neville**

appeared before the Grey Eagle Township Board at its regular monthly meeting to **present and discuss** a permit and variance request that has been submitted to the **Todd County Planning and Zoning Department**.

The subject of the permit request involves the property located at:  
**30139 122<sup>nd</sup> Street, Grey Eagle, MN 56336**

The request as described is for:

**A permit to remodel said referenced property**

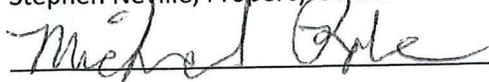
This letter serves solely as an acknowledgment that the property owner appeared before the Township Board for the purpose of discussion only. **The Grey Eagle Township Board holds no authority, assumes no responsibility, and accepts no liability** in regard to the approval, denial, or enforcement of this or any other variance request. The requirement for appearance was made by **Todd County Planning and Zoning**, and not by the Township Board.

This record of appearance is provided at the request of the County as part of its variance application process.

**Signatures:**

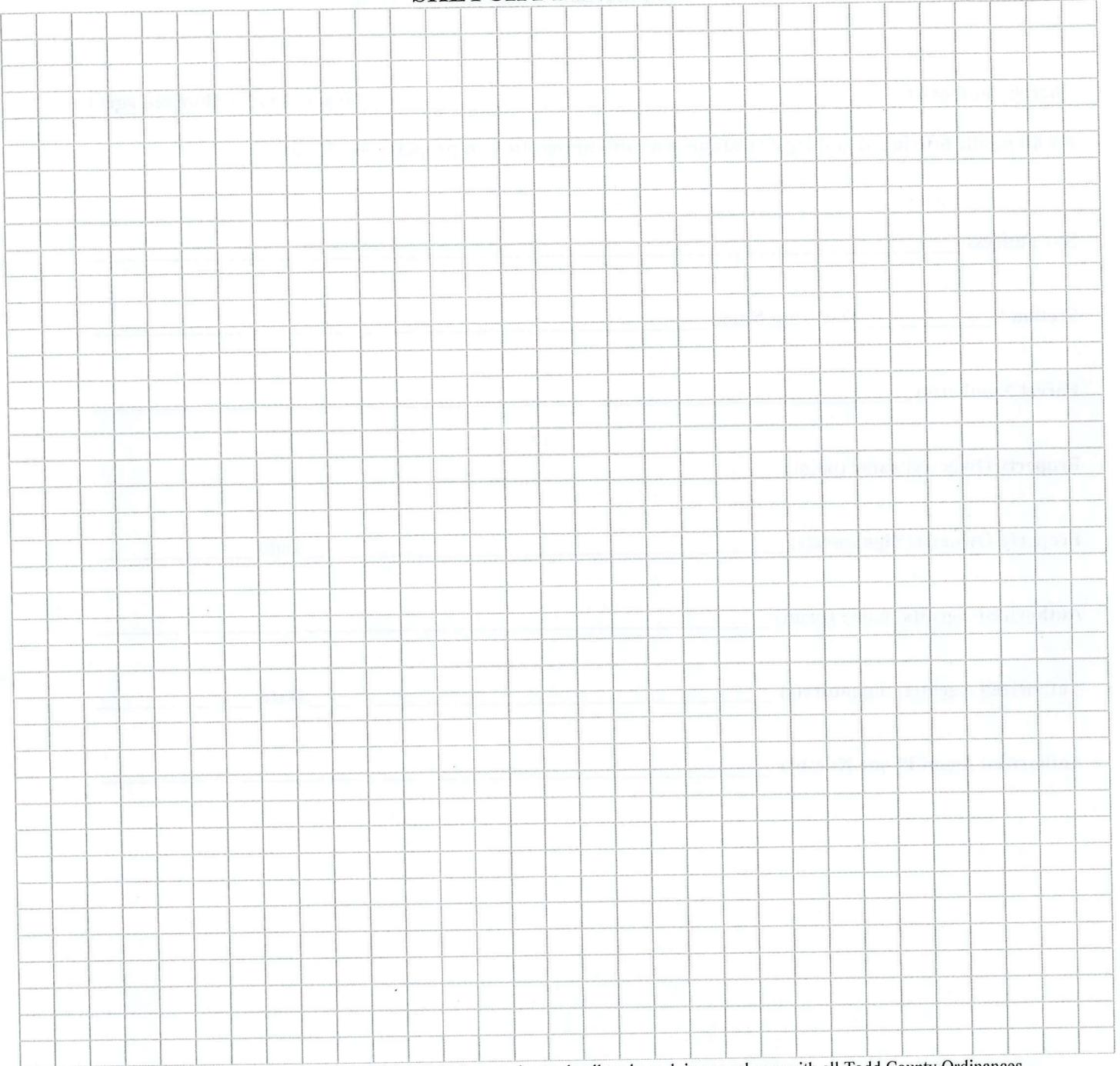


Stephen Neville, Property Owner



Chairperson, Grey Eagle Township Board, Michael A. Rohe

# SKETCH DRAWING



The applicant or agent hereby makes application for a variance agreeing to do all such work in accordance with all Todd County Ordinances. Applicant or agent agrees that site plan, sketches, and other attachments submitted herewith are true and accurate. Applicant or agent agrees that, in making application for a variance grants permission to Todd County, at reasonable times during the application process and thereafter, to enter applicant's premises to determine the feasibility of granting said variance or for compliance of that application with any applicable county, state, or federal ordinances or statutes. If any of the information provided by the applicant in his/her application is alter found or determined by the county to be inaccurate, the County may revoke the variance based upon the supply of inaccurate information.

**If the applicant is not the property owner, both signatures are required below.**

Steve Neill  
Applicant Name Printed

[Signature]  
Signature

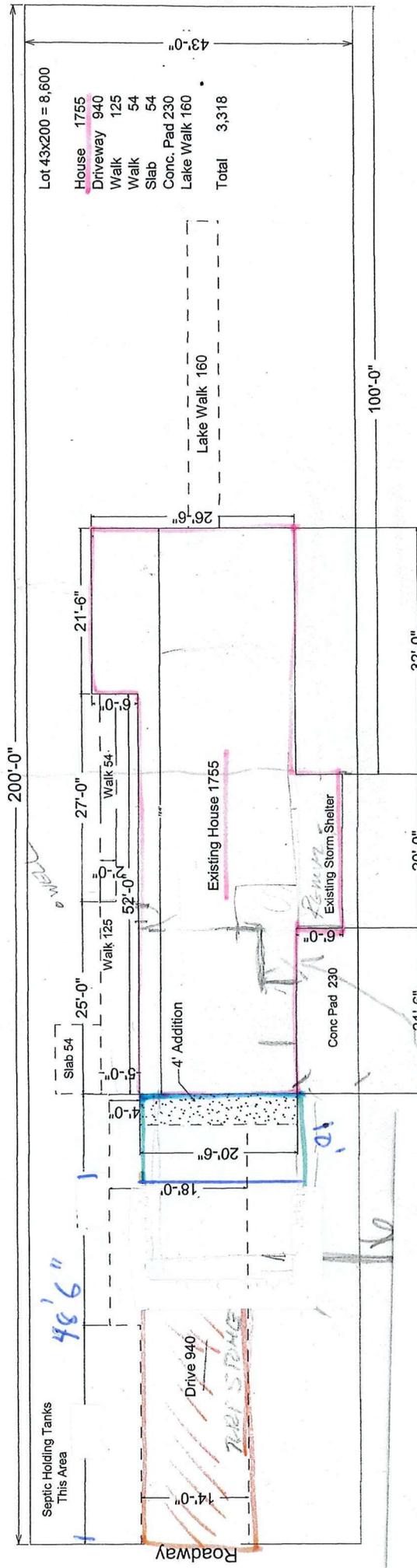
2/2/26  
Date

\_\_\_\_\_  
Property Owner Name Printed

\_\_\_\_\_  
Signature (If different than applicant)

\_\_\_\_\_  
Date

LOT TOTAL SF



# IMPERVIOUS SURFACE WORKSHEET (FOR SHORELAND ONLY)

## APPLICANT INFORMATION

Name Steve Neville Site Address 30139 122nd Street  
 Phone [REDACTED] City Grey Eagle State MN Zip 56336  
 Mailing Address 30139 122nd Street Parcel Number 11-0046000  
 Lake/River Name Big Birch Lake

**IMPERVIOUS SURFACE:** is a constructed hard surface that either prevents or retards the entry of water into the soil or causes water to run off the surface in greater quantities & at an increased rate of flow than prior to development.

## LOT/STRUCTURE DIMENSIONS

Total lot area: 8600 sq ft

List all structures (structure's foundation footprint: length, width, and total area)

Existing	Proposed
1. Existing House 1755	Addition 205 = Total 1960
2.	
3.	
4. roofed: 20.4%	roofed: 22.7%
5. current	proposed
6.	
7.	
8.	

List all non-roofed hard surfaces: Examples include sidewalks, paver stones, retaining walls, patios, decks, driveways & parking areas (asphalt, concrete or gravel), and areas of landscaping underlain with plastic or other impervious liners:

Existing	Proposed
1. Existing Driveway 940	Replaced with GEO Block
2. Walk to Side Door 125	" " " "
3. Walk From Side Door to Sun Room 54	" " " "
4. Concrete Picnic table Pad 54	" " " "
5. Storm Shelter 120	" " " "
6. Lake Walk 160	No change 160
7. Concrete Pad adjacent to Garage 57.5	Replaced with Dirt
8. Total <del>1512.50</del> 1174.50	<del>1352.50</del> impervious removed 1014.50

Less addition = 604

**Total of 25% of lot may be covered by impervious surfaces (15% of which are from roofed structures)**

Current total: 34%

Proposed total: 24.65%

1. List in the table below any efforts by landowner to reduce project impact by removing or reducing impervious surfaces.

List Structure or Impervious Surface to Be removed	Square footage to be removed	Location of structure or impervious surface to be removed (see table below)	
Example: concrete drive to lake	8' x 35' = 280 sq ft	(C) Within Impact Zone	
1) walk to side door	125	<i>Total "Removed" made permeable 1014.50</i> <del>1280.50</del>	
2) walk from side door to Sun Room	54		
3) Existing Class 5 Driveway	940		
4) Concrete Picnic Table Area	54		
5) Storm Shelter	120		
6) Concrete Pad Adjacent to Cottage	575		
Location of variance request in reference to Ordinary High Water level	General Development Lake	Recreational Development Lake	Natural Environment Lake and Rivers / Streams
A. Outside shoreland building setback	75'+	100'+	150' +
B. Between Shore Impact Zone and Building Setback	37.5' to 75'	50' to 100'	75' to 150'
C. Within Shore Impact Zone	0 to 37.5'	0 to 50'	0 to 75'

2. List below any Storm Water Management Best Management Practices (BMP's) that will be installed to help mitigate impacts of development.

INFILTRATION BMP's

List any measures you plan on taking to increase water infiltration and retention. Examples include rain gutters, rain gardens, retention swales, berms, sub-surface tile, etc. Efforts to install BMP's will be graded positively in the site evaluation. Locate projects on site map.

*Gutters flowing away from Lake*

VEGETATION BMP's

Vegetation planting along lake shore areas is also a Best Management Practice. Planting areas of your lakeshore impact zone with permanent vegetation helps infiltrate water, reduce lake impact, provide habitat, and screen the dwelling from other lake users. Plantings are graded positively in the site evaluation. List any areas to be planted or restored and mark the location on your site map.

*Leaving mature trees by the Lake - Habitat preservation.*

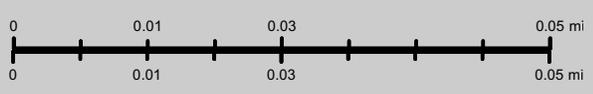


Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, 2023



Todd County GIS  
215 1st Ave S, Ste 102  
Long Prairie, MN 56347  
(Office) 320-732-4248

**GIS Site Map**



The Todd County GIS & Land Services Department has made every effort to provide the most accurate and up-to-date information available in this publication and cannot be held responsible for any unforeseen errors or omissions. If the recipient wishes to locate parcel corners and property lines, employ the services of a Registered Land Surveyor.

Printed on:  
Tuesday, February 3, 2026

## Introduction:

E.A.R.T.H, the Environmental Assessment for Riparian and Terrestrial Health, is a partnership between residents, landowners, business and industry, the Soil and Water Conservation District (SWCD), and Todd County for the overall goal of sustaining the natural benefits of rural living which includes:

- clean lakes and rivers,
- safe drinking and ground water,
- excellent wild and aquatic habitats for hunting, fishing, sightseeing, and exploring,
- flood protection through existence of riparian wetlands,
- prime soils for food production, forage, flowers, and home gardening.

The EARTH program is made up of environmental land health assessments for farmers, lakeshore properties, and small town urban, residential, commercial, industry and public institutions. Examples of these assessment tools are found at the end of this book. Assessments can be done by the individual but are designed to be completed by SWCD technical staff upon request of any of the above property owners, lake associations, or groups. These assessments provide partners options for future land use and property improvement in regards to natural land, water and soil-scapes. This program also honors outstanding properties with exceptional natural resource management.

This program incorporates components of the MN Ag Water Quality Program, state and national lake assessments, and farm, ranch, and feedlot assessments. This is a non- regulatory program while also being a resource for landowners navigating the regulations bound to them by property ownership.

Todd County is made up of wetlands, prairies, forest and glacial remnants, prime farmland, many lakes, meandering streams, and key rivers leading to the Mississippi. The most central river and watershed in Todd County is the Long Prairie running from the mid-western border of the county adjacent to Douglas County up through to the northeast corner. Other major watersheds in the county include the Sauk River in the south, the Mississippi- Sartell in the lower southeast corner, the Mississippi- Brainerd along the eastern border of Todd County, the Crow Wing to the north, and the Wing/Red Eye River watershed in the northwest corner of the county. (See watershed map, pg. 3.)

Making wise land use decisions is crucial for creating healthy landscapes that benefit individuals and families in the long term. The placement of structures and roads, the extent to which we disturb the soil, how we manage yards and stormwater, and the rerouting of natural water flows—both above and below ground—significantly affect the sustainability of our natural resources. Additionally, respecting the ecology of lakes and surface water is essential for those who enjoy recreational activities or earn a living near the lakes and rivers of Todd County.

We begin this guide with a breakdown of five of the six watersheds, the primary resources within the watershed, and the stressors on this region of Todd County in regards to the natural environment. In each section is found specific recommendations, actions, and resources for preventing and correcting the particular environmental stressor or hazard.

A list of potential funding resources such as cost-share, federal and local funding assistance programs, grants, and low interest loans can be found following this watershed sections beginning on page:

The permitting and setback section on page 6; informs property owners of potential regulatory agencies that may need to be contacted when making improvements to a property.

Finally, the assessment forms, contact number for Todd Soil and Water Conservation District, Planning and Zoning and recognition programs close out this guide for program participants.

Thank you for your partnership.

“Water flows from the land to rivers to air, in and out of soil, rocks, and organisms, in sustenance, reminding us there is no separation of water from the earth, or of us from the water.” – modified from Lynn Culbreath Noel, American historian



**Mound Lake, Todd County MN** - aptly named. In 1910, there were “three fine cottages” already on the lake. (*Genealogy Trails History Group, Todd County, MN*). Proper land use practices are encouraged in the watershed and by lakeshore owners to protect and maintain the good water quality and fish habitat in Mound Lake. (*Minnesota Lake Link*)

## E.A.R.T.H.—Our World as Todd County Sees It

**E.A.R.T.H.** the **E**nvironmental **A**ssessment for **R**iparian **T**errestrial **H**ealth is a proposal by Todd SWCD District Manager and Water Planning to assist landowners in riparian and residential areas in assessing the health of their property and the impacts yard care may have on water quality.

Similar to Maine's Lake Smart and Vermont's Lake-Wise programs and following suit with the Minnesota Ag Water Quality Certification Program (MAWQCP), E.A.R.T.H. will debut in Todd County as a voluntary outreach effort to educate landowners, promote change, and "award" lake and residential stewards within the County with cost-share incentives to install Best Management Practices, preferential variance reviews and recognition signage.

**W**hy? After years of conducting business and work under the Feedlot and Ag Water Quality Programs and transitioning to lakeshore and riparian programming, a clear disparity was noted concerning programs offered to farmers as opposed to lakeshore and residential owners. While more than half of water quality impairments are caused by stormwater run-off, septic, impervious runoff, road salts, yard management, including bacterial and pet wastes, this segment of the population has been nearly ignored programmatically speaking here and in many other parts of the state. As we have heard before, we are all in this together; it is a shared problem, and observing a lack of education in this segment of the population beckons reform.

**W**hat and Who? **E.A.R.T.H.** assessments will be required for all non-farming landowners seeking cost-share assistance and variances and made *voluntary to lake associations, riparian lots, and residential neighborhood landowners.*

Similar to a MinnFARM run on farm feedlots and the Ag Water Quality Assessment Tool, **E.A.R.T.H.** will use a combination of DNR's Score your Shore, Vermont's LakeWise and Maine's LakeSmart assessment tools to holistically score current practices and land use on an individual property. SWCD, land use planners, and interested landowners will be educated in using the tool and in the best management practices to improve a parcel's score. For more higher cost improvements, cost-share can be applied for through the SWCD's various grants or the riparian funding itself. Once a high E.A.R.T.H. score is obtained based on a simple scoring rubric, landowners will earn their signs. A ten year operation and maintenance will be expected on a cost-shared project. Similarly neighborhoods and lake associations can earn recognition based on the percentage levels (25%, 50%, 75%, 100%) of lake shore owners who implement change over the next ten years.

Best management practice changes may include:

- **Replacing Kentucky bluegrass with a deep rooted fescue; raising mower heights,**
- **Decrease lawn size or utilization of no mow zones,**
- **Install of roof runoff controls,**
- **Rain gardens,**
- **Drip line infiltration trenches,**
- **Vegetative swales,**
- **Re-sloping, pervious surfaces &/or crowned driveways,**
- **French drains,**
- **Tree and shrub establishment and native buffers**
- **Composting leaves & grass clippings,**
- **Grass or rock lined drainage,**
- **Live staking steeper banks,**
- **Rip rap,**
- **And invasive weed and brush controls**





WHERE THE FOREST MEETS THE PRAIRIE

# Todd County

• MINNESOTA • EST. 1855 •

SOIL AND WATER CONSERVATION DISTRICT

215 1<sup>st</sup> Avenue South, Suite 104

Long Prairie, MN 56347

Phone: 320-732-2644 Fax: 320-732-4803

## Todd County SWCD Shoreland Assessment Form

### Landowner Information

Name: \_\_\_\_\_ Water Body Name: \_\_\_\_\_ Assessment Date: \_\_\_\_\_

Site Address: \_\_\_\_\_ Watershed: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Township: \_\_\_\_\_ Parcel ID Number: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

Assessment by: \_\_\_\_\_

### Assessment Questions

#### ◆ Land Use Category (Questions 1-6) 100 Points

1. What percentage of the shoreland property contains buildings, patios, driveways, parking areas, or other impervious surfaces?
  - Less than 5% = 20
  - 5% to 15% = 10
  - 15.1-25% = 5
  - Greater than 25% = 0

**/20 points**
  
2. Does landowner maintain a legally designed septic system according to best management practices, such as pumping every 1-3 years?
  - Yes , consistent maintenance over the years =10
  - Yes, only recently for permitting , sale or purchase reasons = 5
  - No known or consistent maintenance= 0
  - No legally designed septic system or only has holding tank or only outhouse is present) = 0
  - The property is bare land = 10

**/10 points**
  
3. When boats, docks, lifts or other equipment is stored on shore, is the amount of space they take up minimized by stacking or elevating blocks?
  - Yes = 10
  - No = 0
  - N/A– no docks = 10

**/10 points**

Total points this page: \_\_\_\_\_

4. Does landowner utilize gutters, downspouts, rain gardens, rain barrels, French drains, buffers, natural wetlands, or other stormwater controls to minimize/reduce the impact of stormwater/roof runoff from buildings and other impervious surfaces?

- |  |  |
|--|--|
| <input type="radio"/> Yes, check all that apply (30) | <input type="checkbox"/> Gutters/Downspouts              |
| <input type="radio"/> No (0)                         | <input type="checkbox"/> Raingardens                     |
| <input type="radio"/> No impervious surfaces (30)    | <input type="checkbox"/> Rain Barrels                    |
|  | <input type="checkbox"/> French Drains                   |
|  | <input type="checkbox"/> Natural Wetlands/native buffers |
|  | <input type="checkbox"/> Underground Tile                |
|  | <input type="checkbox"/> Other                           |

**/30 points**

**Award 10 Bonus Points if 3 or more checked**

5. Are pervious/permeable pavers, septic rock, or stepping stones utilized as an alternative to concrete walking paths on property to increase stormwater infiltration into soil?

- Yes = 10  
 No = 0  
 N/A (No hard surface paths) = 10

**/10 points**

6. Is a man made sand beach/beach blanket present along shoreline?

- Yes = 0  
 No = 10

**/10 points**

### ◆ **Erosion Category (Questions 7-10) 120 Points**

7. Is shoreline erosion visible on property? If yes, what is the severity of the erosion?

- Yes—erosion from landside is substantial with gullies, slumps, and/or slides = 0  
 Yes—undercutting from lakeside wave and ice action/lack of shoreline vegetation or leveling ice ridge = 10  
 Yes—erosion is present but minor— minimal to no significant cuts on shoreline or bare disturbance= 20  
 Erosion caused by adjacent lands not owned/under control of the landowner AND landowner has communicated in a positive manner with adjacent landowner(s) to try to come up with a solution = 30  
 No erosion visible = 40

**/40 points**

8. What shoreline stabilization methods are being used to limit shoreline erosion? Underline or check all that apply.

- No stabilization methods used and shoreline is unstable to any degree = 0  
 Retaining Walls/ Rock rip rap or large rocks = 5  
 Bioengineering (coir logs, willow wattles, cedar revetments, etc.)= 10  
 Native plantings (native shoreland buffer) = 20  
 N/A (No erosion or shoreline is 100% natural and stable) = 30 points

**/30 points**

9. Is property (excluding the impervious surfaces) evenly vegetated with healthy plants and free of bare soil?

- No. There are large areas (>25 sq. ft.) of bare soil from foot traffic, shade, construction, or water flow = 0  
 There are small patches of bare soil in yard/lawn/shoreline = 15  
 Yes. There is good vegetation cover (any type) and no terrestrial invasives = 25

**/25 points**

Total points this page: \_\_\_\_\_

10. Are there deposits of sand or soil in flat areas on property?

- Yes (large amounts > 25 square feet) =0
- Yes (small amounts < 25 sq. ft.) = 15
- No = 25

**/25 points**

◆ **Vegetation/Pest Management Category (Questions 11-14) 100 Points**

11. How are pests and vegetation managed on property?

- Large areas are sprayed using broadcast pesticide and/or herbicide. = 0
- Target spray smaller areas with pesticide and/or herbicide, regardless if the target is an invasive pest or plant = 10 (dandelions, for example– good for the environment; unsightly to some landusers)
- Use pesticide, poisons, and/or herbicide to selectively manage healthy species vs. invasive pests or plants and/or prepare the site for native plantings. = 15
- Use non-chemical means such as manual removal, fencing (geese), traps ( burrowing rodents) native supports and plant diversity, or shading with woven materials or newspapers to manage pests and vegetation. = 20
- Does not actively manage pests and vegetation that are present on property resulting in a thicket or large plots of invasives and/or humps and holes or droppings, wastes or litter accumulation. (0)

**/20 points**

12. Does landowner apply fertilizer to their lawn on shoreland property?

- Yes, one or more times per year without a nutrient management plan= 0
- Yes, uses natural/organic fertilizers = 15
- Yes, but only after soil testing to see what, is any chemicals/minerals are necessary = 25
- No = 30

**/30 points**

13. Has landowner planted native plants/vegetation or trees on property since becoming owner?

- Yes, landowner has planted a small amount of native vegetation (gardens) or trees (> 3/acre) = 15
- Yes, landowner has planted a large amount of native vegetation (entire shoreline buffer) or trees = 30
- No (0)

**/30 points**

14. Does landowner actively manage/control terrestrial invasive species (buckthorn, purple loosestrife, etc.) on property?

- Yes (20)
- No (0)
- N/A (No terrestrial invasive species present) (20)

**/20 points**

Total points this page: \_\_\_\_\_

## ◆ Shoreland Buffer Zone Category (Questions 15-18) 100 Points

15. Property has a variety of plants other than turf grass within shoreland buffer zone . Examples include flowers, native grasses, shrubs, and trees within the shoreland buffer zone?

- Yes  
 No

**/25 points**

16. Does property owner allow native vegetation to grow (doesn't mow) within the buffer zone?

- Yes  
 Yes, periodically mows once per month) = 10  
 No, mows frequently = 0

**/25 points**

17. What percentage of the buffer zone is un-mowed and or includes native grasses, plants, trees or shrubs?

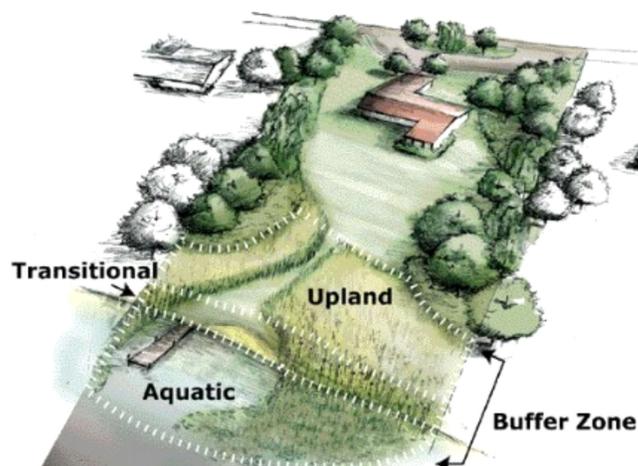
- 0-25% = 0-5  
 26-50% = 10  
 51-75% = 20  
 76-100% = 25

**/25 points**

18. What percentage of the Transitional Zone or shoreline frontage has disturbed or maintained areas like lawn, beach, recreational areas, patio?

- 0-10% Minimal disturbance = 25  
 11-35% Some disturbance (15)  
 >35% A lot of disturbance (0)

**/25 points**



## ◆ Upland Zone Category (Questions 19-22) 100 Points

19. What percentage of upland zone includes trees, shrubs?

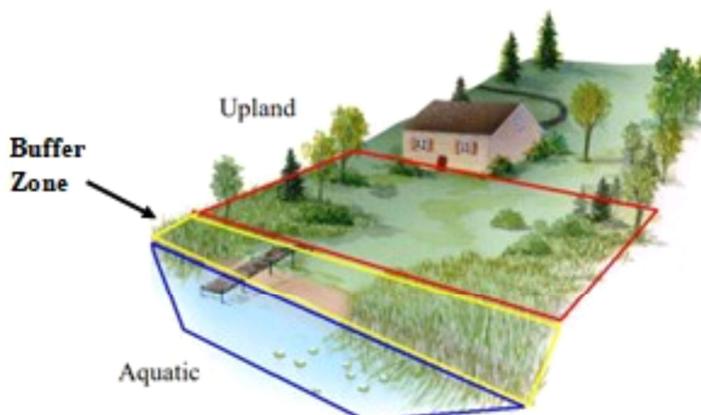
- 0-25% = 0-5  
 26-50% = 15  
 51-75% = 25  
 76-100% = 30

**/30 points**

20. What percentage of upland zone includes natural ground cover such as grasses, ferns, flowers, etc.?

- 0-25% (0-5)  
 26-50% (15)  
 51-75% (20)  
 76-100% (25)

**/25 points**



Total points this page: \_\_\_\_\_

21. Does upland zone receive any sediment or surface water contributions from any neighboring properties or land uses? Examples include roof runoff, driveway runoff, etc.

- Yes, significant amounts with visual impacts = 0
- Yes, small amounts with no visual impact = 10
- No = 15

**/15 points**

22. Are there any eroding areas visible within the upland zone?

- Yes, large areas visible = 0
- Yes, small areas visible = 10
- Yes, small area visible that does not break to lake or river = 15
- No = 30

**/30 points**

◆ **Aquatic Zone Category (Questions 23-25) 80 Points**

23. Are human made openings in plant beds present within the Aquatic Zone?

- Yes, minimal clearing of plant bed (path for watercraft and/or small dockside clearing) (15)
- Yes, significant amount of plant bed cleared (25% or more plants removed) (0)
- No (30)

**/30 points**

24. Does landowner uproot, cut or otherwise remove aquatic plants in the water in front of their property?

- Yes, small amounts of aquatic plants are removed. (15)
- Yes, large amounts of aquatic plants are removed (0)
- No, aquatic plants are left as they are. (30)

**/30 points**

25. Does landowner allow fallen trees to remain in water providing habitat for wildlife and/or fish/invertebrates?

- Yes (20)
- No (0)
- N/A (20)

**/20 points**

◆ **Miscellaneous Category (26-30) 100 Points**

26. If rock rip rap is used on shoreline, is it at a 3 to 1 slope or flatter?

- Yes (10)
- No (0)
- No rip rap (10)

**/10 points**

27. Roughly what percentage of property contains forest, wetlands, or is natural?

- 0-10% (0-5)
- 11-25% (10)
- 26-50% (20)
- >50% (30)

**/30 points**

28. How many different species of trees and/or shrubs are present within the upland and buffer zones on the property?

- 0-3 (0-5)
- 4-6 (10-15)
- 6-9 (20-25)
- 10 or more (30)

**/30 points**

Total points this page: \_\_\_\_\_

29. Does property owner remove pet waste, ashes from fire pits, or piles of leaves on lakeshore preventing them from washing into the lake?

- Yes (20)  
 No (0)

***/20 points***

30. When and if the landowner mows the lawn, does he/ she bag the clippings, direct the trimmings away from the lake, or does he/she not recollect the direction of lawn trimmings when mowing the lawn?

- Does not mow lawn /all natural= 10  
 Bags trimmings = 10  
 Directs clippings away from the lake = 5  
 No recollection of direction = 0

***/10 points***

31. Location of well– mark on map. No points assigned

- Drilled: cased or uncased?  
 Sandpoint  
 Hand dug  
 Well located in MN well Index?

**Directions: Add up questions 1-30 on the assessment form get a total shoreland stewardship score for the landowner. Below are the three stewardship tier point thresholds.**

**Bronze= 251-350**

**<100>**

**Silver= 351-500**

**<150>**

**Gold= ≥ 501**

**<200>**

**Max Points= 700**

**Total EARTH Score:**

Total points this page: \_\_\_\_\_

### Additional Landowner Information (Not scored)

	Yes	No
Has landowner previously worked with Todd County Soil and Water Conservation District on any cost share projects?	<input type="checkbox"/>	<input type="checkbox"/>
Is property located within a Drinking Water Supply Management Area (DWSMA)?	<input type="checkbox"/>	<input type="checkbox"/>
Is the property landowner's permanent residence?	<input type="checkbox"/>	<input type="checkbox"/>
Is landowner member of a Todd County Lake Association?	<input type="checkbox"/>	<input type="checkbox"/>
Is property located on a MPCA impaired water body?	<input type="checkbox"/>	<input type="checkbox"/>
Has landowner owned property for more than 5 years?	<input type="checkbox"/>	<input type="checkbox"/>
Is property located within a City, Sauk River Watershed District, Sylvan Shores, or Township that does own zoning such as Bruce or Bertha?	<input type="checkbox"/>	<input type="checkbox"/>
Is the shoreland zoning district for property General Development or Recreational Development?	<input type="checkbox"/>	<input type="checkbox"/>
Do you observe stormwater from neighboring properties causing problems on your property?	<input type="checkbox"/>	<input type="checkbox"/>
Is landowners lake of residence infested with any Aquatic Invasive Species?	<input type="checkbox"/>	<input type="checkbox"/>

**Notes:**

Total points this page: \_\_\_\_\_

## Property Site Conditions

### ◆ General Conditions

Slope or aspect faces which direction:  East  West  North  South

Steepness of slope:  Nearly vertical  > 45% angle  < 45% angle  Relatively flat

Wave action on shoreline:  Severe  Moderate  Infrequent  Minimal

Source of wave action:  Wind  Boat traffic  Other \_\_\_\_\_

Ice ridge present:  No  Yes If yes, how high \_\_\_\_\_

Water level fluctuation:  Highly variable  Moderately variable  Relatively stable

Reasons for water level change:  Seasonal (high in spring, low in summer and fall)

Control at the outlet  Changes after most rains

Wetlands present on property:  No  Yes If Yes, what type of wetlands \_\_\_\_\_

Groundwater springs or seeps on property:  No  Yes

Dominant soil:  Sand  Silt  Clay  Loam  Clay Loam  Sandy Loam  Silt Loam

Soil type: \_\_\_\_\_ (ex. 800C, Kandota Dorset Sandy Loams)

### ◆ Current Management and Shoreline Problems

Upland:  Natural  Mowed  Rock  Wooded  Garden  Other Pollinator planting

Transitional:  Natural  Mowed  Rock  Wooded  Garden  Other \_\_\_\_\_

Aquatic:  Natural  Weed-rolled  Sand  Rock  Other \_\_\_\_\_

Shoreline treatment:  Riprap  Retaining wall  Coir log  Other \_\_\_\_\_

Is the shoreline treatment failing:  Yes  No

Degree of upland erosion:  Severe  Moderate  Some  None

Description (such as gullies, ground settling)

Degree of shoreline erosion:  Severe  Moderate  Some  None

Description (such as undercut banks) \_\_\_\_\_

### ◆ Existing vegetation (how much, what kind)?

Upland:  Turf grass  Mostly invasives  Mix of invasives & natives  Mostly natives  Trees & Shrubs

Transitional:  Sand/rock beach  Turf grass  Mostly invasives  Invasives & natives

Mostly natives  Trees & Shrubs

Aquatic:  None  Mostly invasives  Mix of invasives & natives  Mostly natives

*Note: X denotes the characteristic **following** the X*

Total points this page: \_\_\_\_\_