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**From:** Lori & Sherm

**Sent:** Wednesday, 24 August 2016 14:54:05 (UTC-06:00) Central Time (US & Canada)

**To:** PUC

**Cc:** Nelson, Chris

**Subject:** comments on Prevailing Winds

Please post this to Prevailing Winds public comments.

Mr. Chris Nelson, Chairman, South Dakota Public Utilities Commission

Dear Sir,

In regards to the Prevailing Winds proposed wind farm in Bon Homme and Charles Mix counties there are so many concerns I scarce know where to start. I will begin with excerpts from the manuscript of the biography of [REDACTED]. Chapter four. page 65: “After a brief rest and a general survey for available lands, Adolf decided to rent a farm...north of the town Avon... In addition to this work there were many trips across the creek bed of Choteau Creek into eastern Charles Mix County as he tried to find just the right piece of land to homestead. Finally, he located what he believed to be a good and proper place to live and farm, [REDACTED]..... The land was gently rolling with some rock outcroppings, but its soil was rich and bounteous.... On the warm summer day of June 17,1895 Adolf traveled by train....to Mitchell. He was traveling to the United States Land Office to file his intent to homestead [REDACTED] [REDACTED].He paid his filing fees and the \$80 initial payment fee. Adolf was to become a land owner.”

Adolf Fuerniss is my great-grandfather and his homestead has now been the ancestral home of five generations of our family. My own father died here within a few feet of where he was born. Our children are the fifth generation to enjoy our natural heritage of this “good and proper place to live”. We have been recognized as a South Dakota Centennial Farm and are nearing our 125th anniversary.

The “Beethoven Wind Farce” was recently built across the road from our home. The nearest turbine is about a mile and a quarter from our house. We had no knowledge of this project until an article in the local paper announced that digging of foundations had begun. In the

November 3, 2015 Yankton Press and Dakota Ronnie Hornstra is quoted saying, "With Beethoven, we did everything we could to be friendly." I find that to be ludicrous at best, if not dishonest. Now this essentially same group of people wants to put another wind farce west, south, and east of our farm. At an informational meeting in Avon in May of 2015, project manager Roland Jurgens said three times in response to objections to wind farms in general and Prevailing Winds in particular, "I know this, you are wrong!" It is very difficult for me to put much stock in statements made by these men at this time!

I have printed the entire Prevailing Winds application and appendices and have comments to make throughout and will try to be brief starting at the beginning.

On page 5-1 is the list of the Board of Managers. Much has been made about this being a local effort. Before the initial meetings, I would have recognized only one name on that list and he is a businessman 25 miles away. None of these men live within the area affected by the project to my knowledge. That does not seem very "local" to this lifetime resident of the area! The LLC is also said to be owned by 160 South Dakota investors—I doubt that very many, if any, live in or have plans to move to the affected area if the project is built.

I have noticed that, beginning with part 6 especially, in any reference to "potential" benefits from the project the word "would" is used almost exclusively, as in "the project would meet growing needs, the project would reduce carbon dioxide, the project would provide, would add, would benefit, would create" and so forth as if these are all foregone facts and conclusions. Later, when any mention is made of potential conflicts or disadvantages are discussed, the word "could" is used almost exclusively, as if they are only possibilities and won't happen.

Page 6-1 states that "demand for ... wind energy is extremely high", due apparently mostly to political reasons, and that the cost of wind energy has declined "by over 66% in the last 6 years." The American Wind Energy Association website accredits this largely to the associated Production Tax Credits. Later on the same page is stated that "weak electricity demand growth and ...competition from...natural gas, have led....to plans to retire coal-fired facilities." High electricity demand at the top of the page and weak electricity demand growth at the bottom of the page. Confusing.

Page 6-2 states "The project would provide significant NEEDED local and regional economic benefits." These few men have taken it upon themselves to decide what is needed for the local area. Maybe the actual residents rather like the area the way it is.

At the 2015 meetings, we were told this project was probably three to four years off so everything could be done properly. Suddenly, approval is needed this calendar year. Page 6-4 explains that without 100% of the Production Tax Credits the project is not feasible unless electricity prices increase or construction costs decrease. Projects at less than 100% PTC would be less successful due to "oversupply in the market and price considerations." It appears that regardless what else is said, the real prize is the Production Tax Credit.

Page 6-6 states "This low cost energy is in high demand by many utilities." In the September Charles Mix Electric "Current Connections" magazine General Manager Russell Gall states while explaining why our rates will be increasing that "Expenses from wind power cost Basin Electric more to produce electricity." No one should expect lower energy costs from wind generated electricity.

Page 6-10 talks about “the goal of energy independence” as if we depend on imported oil or something else to generate electricity.

Pages 8-10 and 8-11 point out the irony of the turbines themselves needing local electric cooperative power to maintain themselves.

“Eliminating and/or minimizing impacts to the environment, cultural resources, and residences” and, oh my, even area residents are discussed on page 9-2 and following. So there are impacts. The “Siting Guide for Wind Power Projects in South Dakota” provided by the Department of Game, Fish, and Parks is more than a little aggravating when it refers to “benefits and tradeoffs” as if they were opposites. Benefits and drawbacks or advantages and disadvantages would be more appropriate.

Section 13 brings out many interesting topics, including failure to mention some of the more rare native grass species found in the area on page 13-1. This is the wildlife and vegetation section supported by appendix B provided by WEST-Inc so I will include comments on that as well. I witnessed some of the surveying done by WEST and while not experienced in that field, had some serious reservations. When a pickup or suburban is parked on a county road in the center of three farms within less than a half mile of each other at 3:00 in the afternoon, what kind of wildlife would one reasonably expect to find? The appendix states that no colonial rodents that attract feeding raptors were found. Apparently they missed the four colonies of pocket gophers on our land adjacent to mentioned county road. The conclusions state that there is high potential for conflict in the areas of migratory pathways, protected species, and state issues with native grasslands.

Native grasslands and prairie are particularly important to us. Our farm encompasses 130 acres of native hay meadows and range, much of it to be impacted by the project. No mention is made of the potential for wind farms to warm and dry the soil in and around them. Much research is ongoing in this area including studies by NASA, Liming Zhou, University of Albany and Somnath Baidya Roy, University of Illinois done in Texas, Iowa, and Illinois. Also, replanting with strains of the same native grasses is not the same as “native prairie.”

Things continue to be interesting as we enter section 15 Land Use, where sound and visual resources are addressed (or tiptoed around). It is disingenuous at best for the wind energy industry to present and predict anticipated sound levels using only the A-weighted decibel scale when at this time it has been firmly established by many researchers including Alec N. Salt, Ph. D., Cochlear Fluids Research Laboratory, Washington University, St. Louis and Bob Thorne, 1 Noise Measurement Services Pty Ltd, Australia that the very low frequency sounds and infrasound created by wind turbines have adverse impacts on people up to 9km distant from the wind farm. While these are not heard as sound they do affect the ear as they are felt rather than heard. Thorne concludes that “By serious harm it is meant that harm is more than annoyance alone and that can be quantified in terms of reported illness, sleep disturbance or other physical effect” including “land-sickness” nausea, state of constant anxiety, anger, and helplessness and mental health issues. These concerns are dismissed by wind energy proponents by saying “If you can’t hear it it can’t hurt you.” That is like saying that ultraviolet light will not sunburn your skin because you can’t see it.

Requiring the total actual sound waves produced by turbines, both heard and unheard, to be reported using the G-weighted decibel scale would give people a much more realistic

expectation of the danger of being too close to operating turbines. At one and a quarter miles from the nearest Beethoven turbines, we routinely hear them several times a week. I have read that 45 dBA is like a refrigerator or a normal conversation. I'm sorry but I don't hear my neighbor's refrigerators or conversations from a mile or more away.

Sound is only one reason the state should consider greater setbacks for turbines. For us a mile and a quarter is too close. GE recommends that employees not linger within 1350 feet of turbines. A German manufacturer recommends 2 km-about 1.25 miles-for health and safety reasons. People across the country according to a recent FoxNews report are clamoring for greater protection from wind farms.

Section 15.4.4 deals with visual impacts. Again, "the array of turbines COULD dominate views" and "marker lighting COULD cause visual impacts at night" and "moving rotors would tend to command visual attention." Really?

Shadow flicker seems to be estimated at about 3600 feet, another reason for greater setbacks. Evidently there will be turbines less than one mile from residences as Roland Jurgens told the Bon Homme County commissioners in November that a one mile setback "would create a huge problem" as per the Yankton P&D, Nov. 3, 2015.

Section 20 brings us to Community Impact. Page 20 says "It WOULD give direct payments of" and lists leases, local taxes of \$680,000, and state taxes of \$885,000 annually. It makes no mention of the \$19,000,000 annual Production Tax Credits to the owner. That is a net loss of over \$17,000,000 a year. I'm sure the government will ask someone else to make it up. Once again, it's the dollars not the people, environment, clean power or anything else.

Page 20-9 states "Only minor changes to population or employment are anticipated as a result of construction and operation." Much ado has been made about jobs and economic development. Maybe ten new fulltime, permanent jobs and only \$300,000,000 spent to create them? Why, that's only \$30,000,000 to create one job. We should all be ecstatic!

Part 23 Decommissioning, If they are removed in 25 years (thousands have been abandoned in the U.S.) and the top four feet of concrete are removed, nothing of value is going to grow with 6 to 8 feet of concrete under it in a 100 foot diameter circle. Pock marks will be left all over the countryside.

My grandparents had a windcharger system for electricity but had the good sense to give it up with the advent of the REA. Do we really want to go back to unreliable, inefficient, and costly wind power?

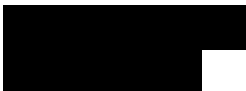
The majority of the neighbors(living in or near the project) that have expressed themselves have been opposed to this. In his 2002 book "Wind Power in View" Paul Gipe has a chapter entitled "Design as if People Matter" It is listed in the AWEA Siting Handbook. Design not BECAUSE people matter but as if they did.

We have been here a long time. We like our home the way it is. We would like to think "Our Lives Matter!"

Thank You for your attention.

Sincerely,

Sherman Fuerniss

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