

Nancy Tarbox

██████████ Bradley, SD 57217

September 13, 2017

Good evening. My name is Nancy Tarbox. I live on my family farm within the original footprint of this project. I have lived in the northern part of Clark County all my life.

I'm here tonight to voice my objection to Crocker Wind Farm's application for a facility permit. This application as presented does not meet the Applicant's Burden of Proof under Section 49-41B-22, nor does it fulfill all requirements as stated in the Completeness Checklist of Section 3.0.

Item 2 of the Applicant's Burden of Proof states that the facility will not pose a threat of serious injury to the economic condition of inhabitants or expected inhabitants in the siting area. Clark County is a community of farmers. During the agricultural season from planting to harvest, farmers require unhindered access to state, county, and township roads. One example is access to Wallace Elevator, where loads are delivered during harvest. In Section 20.2.4.1, Ground Transportation, Crocker Wind Farm estimates that there will be 375 large truck trips per day and up to 875 small-vehicle trips per day during peak construction periods. The same section states that "such use is not anticipated to result in adverse traffic impacts". These are staggering numbers of slow-moving, oversized trucks that will back up traffic in both directions. The economic impact of denying timely regular access to rural business partners is an implication that cannot be underestimated.

This brief, vague language used to describe Crocker Wind Farm's impact to local traffic (and therefore the local economy dependent on the traffic) leaves numerous unanswered questions. The majority of the roadways within the boundary are limited maintenance township roads built to support farming equipment, not heavy industrial trucks that weigh a minimum of ~~800,000 lbs.~~ What is the plan for adapting these roads? After road expansion, will Clark County be asked to absorb the increased cost of road maintenance? What are the number of hours of anticipated construction transportation per day? Where will the construction vehicles stop for gasoline, service, food, and bathroom facilities within the project area? There are very limited options within the region to address these needs.

Crocker Wind Farm states in the same section of the application, Section 20.2.4.1, that they expect to enter into road use agreements with the county and township. As transportation is a critical element of the construction as well as ongoing maintenance of the turbines, partnership with the local road commissions is a critical element to ensure sufficient planning prior to the start of the project. As of September 12, Highway Superintendent ██████████ stated that he has received no communication from Crocker Wind Farm. This application cannot be complete without effective due diligence on this critical point.

Crocker Wind Farm has submitted an application for a large-scale project with significant economic, environmental, and social impact to the residents of Clark County. We understand that the scope of this project sets a precedent within South Dakota. If we are to be pioneers in this undertaking, methodical planning with clear data is required. I am deeply concerned by the state of this application. Stating that partnerships with local road commissions are "TBD" demonstrates ineffective attention to detail on a crucial aspect of the project. Stating that adding 1,250 vehicles per day to our roads will not affect local traffic is preposterous and shows blatant disregard for the surrounding community. One of two things is clear: either Crocker Wind Farm has demonstrated serious lack of care preparing this application, or they are intentionally omitting key facts to obtain approval.