

Good afternoon Commissioners and Staff, My name is Shad Stevens

I would like to address several issues with Geronimo's new permit application. This application is primarily a cut and paste of the previous application and most of the issues are not new:

- The application is vague re: number, exact location & capacity of turbines.
- Siting guidelines of FWS and GF&P were ignored.
- The issue of turbines on grassland easements is still pending.
- Litigation with County BOA is not settled!

The Application is purposely difficult to analyze: Agency correspondence is disorganized and incomplete; maps are not dated; relevant maps are omitted; attachments to agency correspondence are missing. The application contains pages and pages of redundant and irrelevant information. The application includes 850 pages to convince us that wind farms do not impact property values. **850 pages, Seriously!??** (Application, 5 pages, Appendix I, 33 pages & Thayer testimony, 812 pages)

There is no evidence in the permit application of written correspondence with Northern Border Pipeline or Clark Rural Water. We can expect a serious issue with multiple crane path crossings of the gas pipeline during construction. The lower right insert on Figure 13, Land Use asserts that there is no irrigated land or organized water system within the project area. Not true! There is irrigated land in Woodland Township and Clark Rural Water serves farms within the project footprint.

Late in 2016, the wind farm project was expanded between Hwy 20 & Day County. This area would host one third of the project's turbines. All studies completed prior to this project expansion are suspect. For example, Lek Studies were not conducted in the area north of Hwy 20 (map attached). The Raptor Study map is omitted. The public has no evidence that the Cultural Resources Study included the area north of Hwy 20. The Comsearch Telecommunication & Microwave Studies did not include the expanded area of interest (map attached). Tier 3 Environmental Impact Studies typically require two years to complete. What impact does the 4<sup>th</sup> Qtr. 2016 wind farm expansion have on the completion of these studies?

Study results are frequently misrepresented by Geronimo. Page 135 of the Application (attached) indicates FCC approval and permit as "complete". The Comsearch study (Appendix G, page 4) contradicts this. It states: "Our study identified three tower structures and seven communication antennas within or near the project area. They are used for microwave, TV and land mobile services in the area. Detailed impact assessments should be performed for each service type". Page 5 of the Microwave Study states: "For this project, turbine locations were not provided; thus we could not determine if any potential obstructions exist between the planned wind turbines and the incumbent microwave paths. If the latitude and longitude values for turbine locations are provided, Comsearch can identify where a potential conflict might exist".

The County's CUP included a requirement for a 3<sup>rd</sup> party telecommunications study indicating any disruptive electromagnetic interference would be unlikely. How can the applicant claim compliance with that condition? And what about the validity of the FCC permit?

In April 2016, NOAA's response to the proposed wind farm expressed concern and requested project updates. Their response included mitigation strategies to reduce impacts to the Aberdeen weather radar: "We would like the developer to consider the following mitigation strategies as they site the turbines: Align turbines so that rows of turbines point towards/away from the radar (along radar azimuths). Avoid siting turbines in the most Northwest corner of the development area (black-shaded area in Fig 2), where impacts would be greatest". Following is text copied from page 110 of the Application revealing Geronimo's blatant deception: "Crocker will implement the suggested mitigation strategies to reduce impacts to radar listed in the response from the DOC, which includes aligning turbines so that rows of turbines point towards/away from the radar". Now look at Figure 5, the most recent map of the proposed turbine siting! While claiming otherwise, Geronimo defied NOAA's mitigation strategy and expanded the project to the North. One third of the project's turbines are now sited in the expanded area of greatest impact and the rows of turbines are sited perpendicular to the radar, not towards/away from the radar! NOAA's map of figure 2 is attached for reference.

Let me conclude by saying that Geronimo is "hell-bent" on starting construction in 2018. They will run roughshod over any obstacle or agency impeding that goal. Don't be fooled by biased studies or empty promises of mitigation strategies; Challenge evasive responses to Data Requests; And don't, for one minute, believe that Geronimo has our landowner's, our community's or our state's interests in mind. To Geronimo it is all about securing tax subsidies, selling the project and moving on!

Thank you for listening,  
Shad Stevens

## 12.0 ADDITIONAL INFORMATION IN APPLICATION (ARSD 10:22:36)

### 12.1 Permits and Approvals

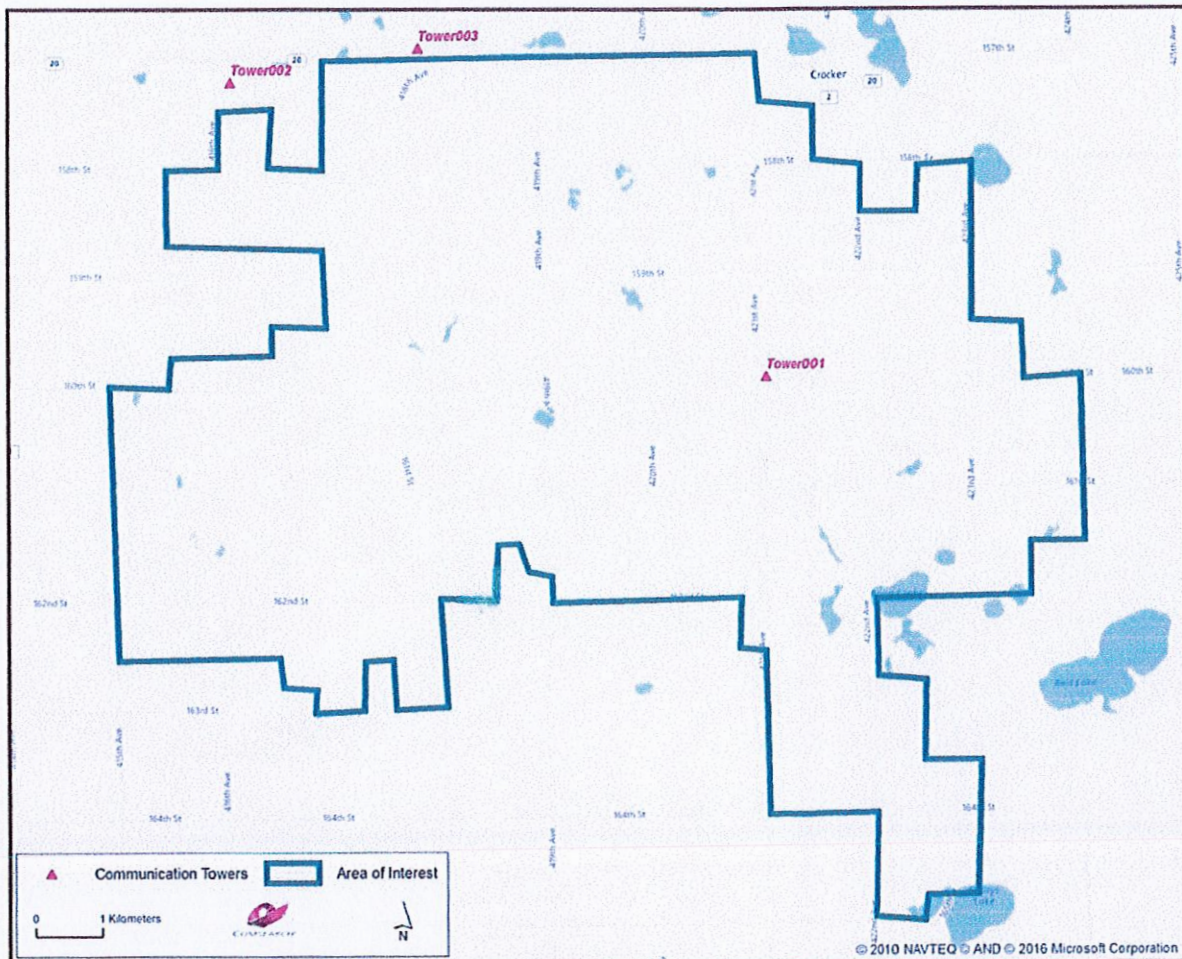
Crocker is responsible for undertaking all required environmental review and will obtain all permits and licenses that are required following issuance of the Facility Permit. The potential permits or approvals that have been identified as being required for the construction and operation of the Project are shown in Table 12-1.

**Table 12-1: Permits and Approvals**

Regulatory Authority	Permit/Approval	Status
<b>Federal Approvals</b>		
USFWS – Lead Federal Agency, Waubay Wetland Management District	Easement Exchange Program	4 <sup>th</sup> Quarter 2019
	Special Use Permit for temporary impacts on wetland and grassland easements	3 <sup>rd</sup> Quarter 2018
USFWS, Region 6 Ecological Field Office	ESA Section 7 Consultation on threatened and endangered species	2 <sup>nd</sup> Quarter 2018
USFWS in coordination with the SDSHS and Tribal Historic Preservation Offices	National Historic Preservation Act Section 106 Review (Class I Literature Review / Class III Cultural Field Study)	4 <sup>th</sup> Quarter 2017
USACE	Wetland Delineation Approvals	2 <sup>nd</sup> Quarter 2018
	Jurisdictional Determination	2 <sup>nd</sup> Quarter 2018
	CWA Section 404 and Section 10 Permit(s)	2 <sup>nd</sup> Quarter 2018
EPA (Region 8) in coordination with the South Dakota Department of Health	SPCC Plan	2 <sup>nd</sup> Quarter 2018
FAA	Form 7460-1 Notice of Proposed Construction or Alteration (Determination of No Hazard)	Ongoing – future revisions may be required depending on layout
	Notice of Actual Construction or Alteration (Form 7460-2)	As required by the FAA
FCC	Non-Federally Licensed Microwave Study	Completed
	NTIA Communication Study	Completed
Federal Energy Regulatory Commission	Exempt Wholesale Generator Self Certification	Before operations

Tower ID	ASR Number	Owner	Structure Height AGL (m)	Latitude (NAD83)	Longitude (NAD83)
Tower001	1037201	Northern Border Pipeline Company	73.0	45.06611111	-97.79861111
Tower002	N/A	Gray Television Group, Inc.	Unknown	45.10638889	-97.89944444
Tower003	1048745	Midcontinent Communications	98.4	45.11055556	-97.86380556

Table 1: Summary of Tower Structures



The DOE noted the Project has potential to interfere with DOE Western operations. Western has three paths that run through the Project Area from the Clark Repeater. However, in a December 1, 2017 letter, the agency notes the Project will not cause problems for Western.

In consultation with the ITC, Crocker modified its collection lines to minimize the distance of paralleling the ITC's copper telephone lines. Following a second review of the Project's collection lines, the ITC indicated on December 6, 2017 that Crocker's proposed collection routes have the potential to cause inductive interference.

### 9.5.7.3 Mitigation Measures for Telecommunications

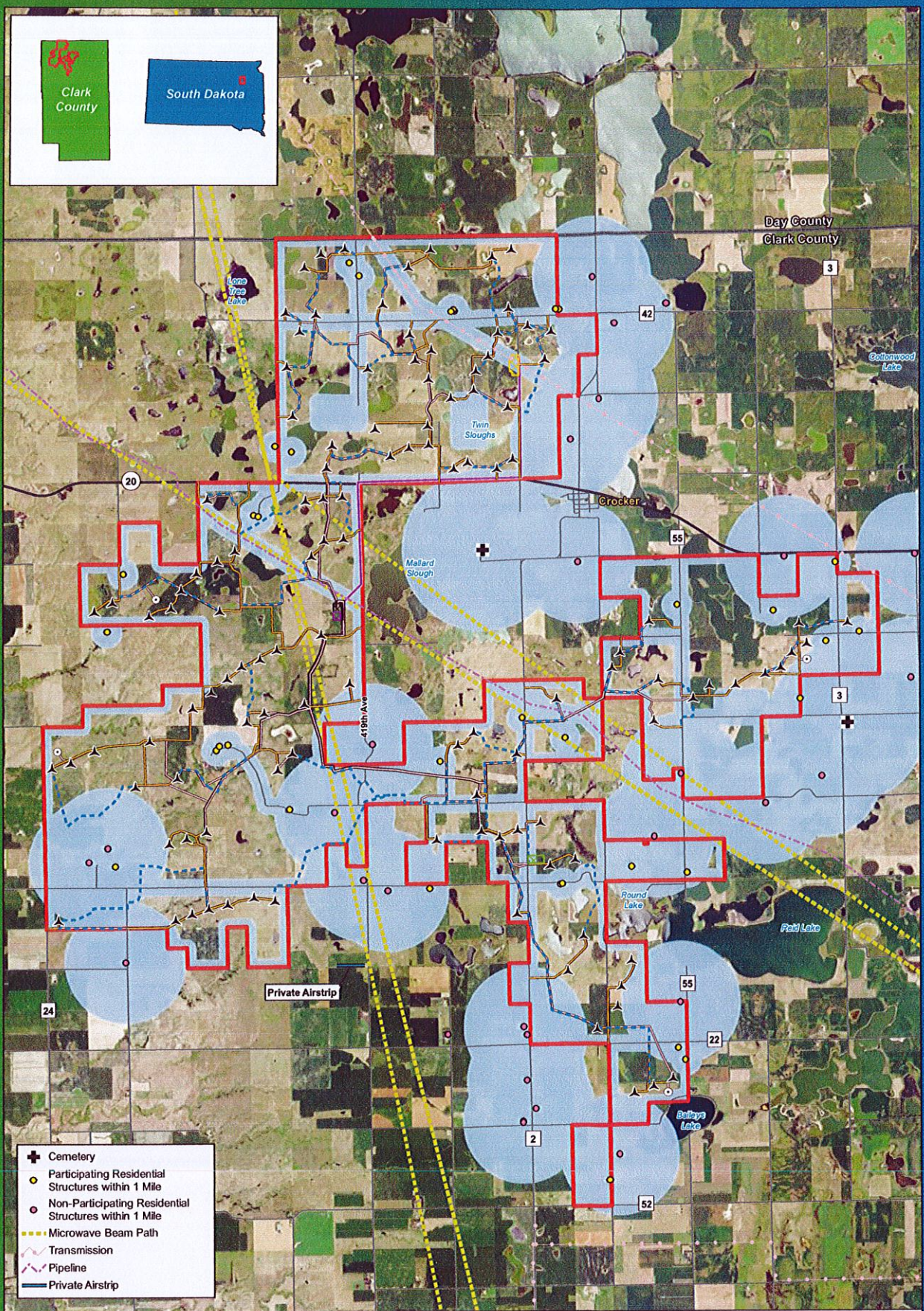
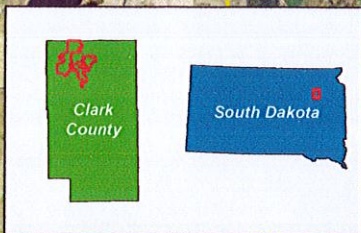
The Project has been sited to avoid microwave beam paths, and therefore, no mitigation is proposed.

Crocker will implement the suggested mitigation strategies to reduce impacts to radar listed in the response from the DOC, which includes aligning turbines so that rows of turbines point towards/away from the radar. Crocker will provide a final layout to the agencies for review and implement further mitigation, as necessary. Additional potential mitigation to ensure accurate rainfall measurements could include installing rain gauges or additional weather stations in the northern portion of the Project Area where precipitation estimates may be impacted. Crocker does not anticipate mitigation will include moving turbine locations. Additionally, the FAA review circulates to the weather radar operators allowing them to map the layout on their radar system to create a mask that then allows them to screen the interference from their forecasting. NOAA does not anticipate impacts to critical tornado detection and, therefore, will not request mitigation.

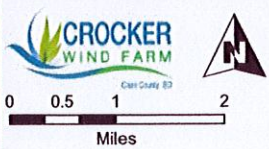
Crocker is coordinating with DOE and Western on turbine placement to avoid impacts with Western operations and beam paths.

In the event the Wind Farm Facility or its operation causes interference to communication systems, Crocker will take the steps necessary to correct the problem. If interference is identified during or after construction of the Project, Crocker will address the interference on a case-by-case basis.

Crocker is in the process of negotiating an agreement with the ITC to ensure any inductive interference will be mitigated through replacing copper with fiber lines. The draft agreement provided by the ITC at the Crocker CUP Hearing on March 7, 2017 contains provisions that required further negotiation and clarification. The draft agreement lacks details including verified testing procedures and information on the current level of service. In addition, the agreement does not quantify potential impacts based on the Project's layout. As field surveys continue and the Project moves through permitting, changes to collection line routes may occur. Therefore, Crocker has requested that an agreement with the ITC be executed once detailed design work on the layout has been completed. The Project's CUP with Clark County require an agreement is in place prior to construction and Crocker will satisfy this requirement following proper due diligence. Crocker is committed to an agreement with ITC that protects ITC's customers and appropriately addresses impacts specific to the Project's interactions with ITC's network.



- ✚ Cemetery
- Participating Residential Structures within 1 Mile
- Non-Participating Residential Structures within 1 Mile
- Microwave Beam Path
- Transmission
- Pipeline
- Private Airstrip



Imagery Source: 2015 Color FSA  
Data Source: Geronimo Energy, MN DNR, USFWS, Census, Comsearch

**Figure 5  
Project Setbacks**  
**Crocker Wind Farm  
Clark County, SD**  
45.079602, -97.845696

- ▲ Preliminary Turbine Location
  - Preliminary Permanent Met Tower
  - Project Area Boundary
  - ⊠ Project Substation
  - ⊠ O&M Facility
  - ⊠ Interconnect Switchyard
  - ⊠ Preliminary Staging Area
  - Interconnection 345 kV Transmission Line
  - Preliminary Access Road
  - Preliminary Collection Line
  - Preliminary Crane Path
  - Setbacks
- Note:  
1. Turbine numbering is not sequential.  
2. Only setbacks that intersect the Project boundary are depicted.