

Joe Blastick

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Clear Lake, SD 57226

To: SD Public Utilities Commissioners

Regarding: Deuel Harvest North Wind Energy Project: EL 18-053

I am writing this letter to OPPOSE the construction of the Deuel Harvest North wind project. I am a landowner and resident and feel that this project is not good for the rural residents and wildlife of Deuel County. After extensive reading and looking at maps, I believe that we do not know enough about the consequences or benefits of this project. You are in a critical position that will shape Deuel County for decades to come and before the decision is made, I believe that we need absolute understanding of the pros and cons. I absolutely believe in the landowner and property right's, it's the American dream to own your own land, BUT these industrial wind projects negatively impact other property owners, residents, and wildlife.

Ecologically, large wind projects can be detrimental to the flora and fauna of the Prairie Coteau (or any other grassland). The Prairie Coteau is the largest intact landscape consisting of northern tallgrass prairie in the country. Our native grasslands are more endangered than tropical rainforest. Its my opinion that we need to do everything possible to protect the grasslands and the critters that inhabit the grasslands and call this home through the course of the year. The prairie pothole region is critical habitat for waterfowl and songbirds alike that rely on intact and open landscapes. We must not allow turbines to be constructed on native prairie or AROUND native prairie and grasslands. It is difficult to identify exactly where the turbines will be located, but turbines 13,14,47,60,69,70,86, 90 appear to be located on native grasslands. Collectively, these turbines do not destroy a lot of native prairie, BUT they will destroy some and then the next project will destroy some and so on. The answer is to not allow ANY native sod to be broken for wind energy. There are plenty of opportunities to build them on crop ground.

It is well documented and known that roads act as corridors for invasive plants. We can not replace the diversity and benefits of native prairie. The impending invasion of non native grasses will further take away from the function of the grasslands. It is IMPOSSIBLE to replace native prairie. When the undesirable plants arrive, that will and does invite spraying which further degrades the grasslands. We have an obligation as stewards of the land to protect and preserve the grasslands.

Many bird species will be affected by the construction of these turbines. Prairie bird species are sensitive to vertical structures and movement, so many species will avoid these areas altogether. That is why its critical to keep turbines away from ecologically sensitive areas, grasslands and wetlands. There are many science-based research papers that document species sensitivity to these large unnatural features. Their findings are conclusive, turbines negatively affect grassland birds and waterfowl. Sharp-tailed grouse, waterfowl, and grassland birds are the most sensitive. Prairie Chickens have shown negative effects from turbines that are 1-3 miles away from their breeding areas. The state of Iowa recommends that there are no wind turbines within 5 miles of a LEK or booming ground. The bird surveys that INVENERGY completed, were not done at the correct time of year to pick up on these areas. Surveys would need to be done in April and done within an hour or two of sunrise. It could take multiple years to properly survey this area and have a high degree of confidence where the breeding grounds are located. This project has pockets of Prairie Chickens as its some of the most intact grasslands in Deuel County. The reality of this is that the Prairie Coteau is a unique and fragmented landscape, if turbines are built it will further fragment the useable area for wildlife. These grassland species require this open grassland habitat and further fragmentation will essentially further hurt already decimated populations. These species have no other place to reside. These 500 foot towers are new and cutting edge technology, and there is not enough science to know how they will affect wildlife. We are at a critical time when projects like this can make or break wildlife populations. What will the area be like when you go out into the project area and not hear waterfowl and grassland birds?

These species can not tolerate this unknown risk, our wildlife populations depend on us getting this right. Additionally, Figure A-3 Environmental Constraints Map on the PUC website, shows three active bald eagle nests that have a 2-3 mile buffer circle around them. These nests are not within the project area. There is a bald eagle nest within a ½ mile of the project area north of Lake Alice. Invenergy's surveys did not detect the nest, but this doesn't mean it can be ignored. That documented and active eagle nest should and MUST be afforded the same buffers as the other nests. There is absolutely no reason they shouldn't be forced to do that, otherwise it simply documents Invenergy is doing mapping exercises out of convenience. A miss in their surveys should bring into question all the other wildlife surveys that have been conducted. I realize there is not a required buffer from active eagle nests, BUT to give other nests a large buffer when they are far from the project area and then not even map the nest adjacent to the project area is nonsense. That nest isn't provided the same buffers because it affects turbine placement and money. The document you handed out in the Clear Lake Community Center clearly states the project "will not pose a threat of serious injury to the environment nor to the social or economic condition of inhabitants or expected inhabitants.." Based on the unknowns with wildlife alone, the PUC CAN NOT GAUARNATEE this and therefore should not permit the project.

I believe that if turbines can cause any single resident negative health effects that it is not worth pursuing. These companies are coming into our county and can not guarantee negative health effect will occur. That is a huge concern. Although there is limited research that scientifically documents direct negative impacts on people, it does very well document that the low frequency noise can cause problems for some people. More importantly those who are affected, generally are unable to sleep. This causes other health issues that are associated to not getting enough rest. We live in the rural areas for the peace and quiet. What happens when a person is affected (participant or not)? Are people going to have to leave their homes? Invenergy certainly will not take towers down for one person. These projects are very different from other agricultural practices. With other practices, if your ag practices affect the adjacent neighbor there are ways to resolve it (chemical drift or trespass). For landowners there are no such protections regarding wind towers. We live in a world of constant noise, lights, and movement. We chose to live in the rural areas to get away from these things. Wind towers from a company headquartered in Chicago, IL that pushes the power to Minneapolis should not dictate our quality of lives.

It is our dream to own land in the country, many people have this same dream. There are many case studies that demonstrate wind turbines directly impact property values in surrounding areas. I was thrilled when the Deuel County Commissioners included language about turbine companies being responsible if property values dropped. Of course that language was removed because although turbine companies say it won't happen, they didn't want to be held responsible. Different studies across the county have documented the drop-in properties values around wind projects. I am NOT ok with this. Should I choose to move, I want to recapture the value of my place. The assessed value may not decline, because of how that is calculated, but the market will certainly show that the interest is not there. People don't want to live in rural areas to see and deal with wind turbines. One big point of contention is the flashing red lights associated with the turbines. In 2018, INVENERGY said in the public meeting, "we will only do what's legally required." Nonsense, we live here, they want to work in our county, they should and MUST use Aircraft Detection Lighting Systems. In the 2019 meeting when the PUC was in Clear Lake, Invenergy said they might if the technology is available. The technology is available, they are pinching pennies at the cost of residents. Politically in SD, there is momentum to rid the landscapes of flashing red lights, it would be a tragedy if this might be one of the last projects that have constant flashing red light before the legislature makes it mandatory. People move to the country to enjoy the peace, quiet, tranquility, sun rises, sun sets, and the vast openness of the Great Plains. There is absolutely value to that and there is no measure of it. People can choose where they want to live, and I chose my site based on all these features.

When projects are proposed in counties, it's assumed that those making the decisions for permitting are unbiased in the process. At the Public Zoning Board meeting at the Clear Lake Community Center in

2018, all the Zoning Board Members and legal representation, stood up at the beginning and declared they had no conflict of interest. EVERY ONE OF THEM DID THIS. Ultimately there was a lawsuit that went to the Third Judicial Circuit Court and the Judge Elshere rules there WAS conflicts of interest with the Zoning Board Members. The PUC can not and should not approve a project that was corrupt in the approvals process. To me it's ridiculous how this has moved on. Our public officials can not make decisions for the County and be unbiased when they are receiving money from the applicant. This is a problem. The whole point of due process is having unbiased decision makers, and in my opinion, if you are receiving financial payments from the industry, you are biased. Its even worse when they declare at a public meeting that there is no conflict of interest, and a Judge rules otherwise. When the County Attorney, and two Zoning Board Members are biased, how can residents expect they are looking out for the good of the County? This is a broken trust between residents and County Officials.

Although I can not be at the meeting in person, I believe the PUC needs to further investigate the following points:

- 1) Is the permitting process corrupt in the county? How can this continue to move forward? I feel this is a prime example of how corrupt and sneaky the wind companies are. They know who they have contracts with. That red flag should have stopped the process and let the county figure it out, instead they moved forward and hoped it wouldn't be discovered.
- 2) There is absolutely no reason to have the constant red flashing lights. Invenergy needs to use aircraft detection lighting. It will at least preserve the night time landscapes. When Invenergy presented in January 2019 at the Clear Lake Community Center for the PUC meeting on their Project Commitment Slide they said: "Wind turbines will be illuminated as required by FAA regulations and will also employ an Aircraft Detection Lighting System (ALDS), subject to the availability and FAA approval." Again this leaves wiggle room, the technology is available, its being used across the country, it just costs more money. Please hold them to the ALDS standard and force them to take a position, IF this moves forward.
- 3) The bald eagle nest MUST be accounted for and given the 2 to 3 mile buffer of no turbines like the other nests they mapped out. If they do not, they must get the necessary Fish and Wildlife Service permits. This is not an exercise of convenience. They can not look nice and give huge buffers to other nests and then no buffer to an active nest they think is an inconvenience.
- 4) The PUC must not allow turbines to be put on native sod. There are resources from SDSU Extension that are the most accurate maps to define these areas. When Invenergy presented in January 2019 at the Clear Lake Community Center they said in their Project Commitments that:
 - a. "Impacts to potentially undisturbed grasslands will be avoided or minimized." That is not a hard answer that they will stay off ALL native/undisturbed grasslands. They left wiggle room to do what they want. They should not get to play both sides of the fence, they either are or are not. I ask that you say they "are not allowed to break or place turbines on native/undisturbed grasslands. Don't allow them to act nice and then do what they want.
- 5) I would like the PUC to actually question the money flow of this project. At the Jan 24 PUC meeting in Clear Lake, they listed a series of annual incomes on their Community Benefits slide. Is this actually true? Has this revenue been actually questioned? I have yet to find anybody who knows how this actually works and pencils out. I question if it doesn't pencil out, because I see small communities across SD and SW MN with turbines and their schools struggle, roads are in poor conditions, and they fight tooth and nail to make budgets work.
 - i. They stated that the Deuel Townships will get \$155K. Which townships (project area or across the county)? Multiple people stood up and talked about the benefits of township roads, and those who talked were not in the project area. Who gets that money, because the perception is all townships get some funds.

- ii. I question the \$360K for the School Districts annually. Is that actually true, please dig in and hold them accountable.
 - iii. They stated that Deuel County will receive \$365K annually as revenue. How is that number derived?
 - a. If these numbers are not questioned, and they are not held accountable, that would definitely change opinions of this project.
- 6) Invenenergy talks about all the new jobs coming to the community. In their Benefits slide on the Jan 2019 PUC meeting in Clear Lake, they stated "approximately 400 direct jobs during construction and approximately 15 direct local jobs during operations." That doesn't mean anything if they aren't local folks being hired. They spin these numbers like its locals who will get employed, hold them to that. Don't let them talk like they will hire locally at public meetings, and then they hire contractors from other states. They always leave wiggle room and paint a different picture than what will actually happen. They always leave an out.
- 7) Is there a document or contract in place stating there is a buyer for this power?

I hope that you are able to get answers and protect the things I value and why I reside in Clear Lake. This is our county, and if wind companies want to do business here, they need and MUST work with us or not be allowed to work here at all. We are at a pivotal point that will forever be looked back on in the history of Deuel County. We must protect the interests of the County, by having a due process. Without an unbiased process, individuals are looking out for themselves first. Nonparticipating landowners need to be heard too. We pay taxes, and live here. I was here first, and this is not my choice to have these turbines, and I will suffer consequences of them. The area is blessed to have the native grasslands and wildlife, which also need to be taken into consideration. I fear the day when I go outside in the spring or summer and no longer hear songbirds and waterfowl. I welcome the opportunity to further discuss my perspectives and points of view.

Thanks for your time,

Joe Blastick

