

Public Utilities Commission  
Capitol Building, 1st floor  
500 E. Capitol Ave.  
Pierre, SD 57501-5070

RE: Docket EL21-018 North Bend Wind Farm Project

PUC Commissioners:

I'm writing in response to the layout of ENGIE's proposed industrial wind farm in Hughes County. I have numerous concerns but the one in particular I want to bring to your attention is with regard to the locations of numerous industrial wind turbines (IWT) that border family crop land viable to the survival of our farming operation.

IWT's sighted too close to properties that rely on aerial applications of crop protection products cause a significant impact on an aerial applicator's ability to safely and effectively fly. Flying at speeds of 140-150 mph, they only have a few seconds at the field edges to make flight maneuvers over and around obstacles in order to reenter the field. 600' IWT's either spinning and creating turbulence or sitting idle pose a serious threat to a pilot; especially when they're less than a mile from the field edge. The proposed locations listed below look to be only a few hundred feet away from the edge of the cropland. **It will be impossible to spray these fields via aircraft safely and effectively.**

Legal descriptions of the effected properties are listed below. I've also highlighted these quarters on an attached map: Exhibit 1.

SW ¼ Section 11 – 111-74 (160 acres): Proposed IWT location 08 is to the north, 15 to the east, 22 to the south and 14 to the west. Each of the IWT's seem to be within 800-1000' from our cropland property line, posing a serious threat to aerial applicators and a significant economic loss to our family farm operation.

NE ¼ Section 10 – 111-74 (160 acres): Proposed IWT location 08 is to the east and location 14 is to the south. These two IWT locations look to be within 1000' from the property line. Location 09 to the east and location 21 to the south look to be within 2/3 of a mile of the property line. Once again, this poses a serious threat to aerial applicators and a significant economic loss to our family farm operation.

The inability to apply crop protection products by aircraft can adversely affect the agronomic and economic impact on cropland. Weeds, insect pests and plant fungi can get out of hand in a hurry costing farms tens of thousands of dollars annually on just one quarter of land if not addressed. Aerial applicators are essential to agriculture and timing is crucial; especially in central South Dakota. Many times soil conditions are too wet to apply products by ground rigs due to the heavy clay soil types in our region. Beneficial fungicides and herbicides must be applied during a stage of the life cycle of a crop at a vulnerable point. Sprayer tires destroy grain crops (wheat) while more significant damage occurs as the undercarriage breaks and topples over taller crops (corn and sunflowers). Miravis Ace is a fungicide application in wheat that requires wheat to be headed out in order to be effective. A sprayer with a 90' boom and a tire footprint 1.5' wide will destroy 6 acres of wheat in a quarter of land. Taller row crops fields would sustain even more damage.

Hughes County is a leader in sunflower production. There are a multitude of insect pests that can significantly damage a sunflower crop including the banded sunflower moth and stem weevil; however the most abundant pest is the seed weevil. Adult seed weevils lay their eggs within the seeds at bloom. The larvae consume the meat of the seed and emerge; leaving the seed blank resulting in oil loss and light test weight. Light test weight sunflowers (under 27#/bushel) will result in grain elevators rejecting the entire crop of sunflowers, which at today's prices of \$.285/pound at a yield of 2400# per acre would cost a farmer a significant economic loss of \$684/acre. Please see attached Exhibit 2, an e-mail from ADM Harrold location manager Brandon Godt.

A major agronomic impact on crop land productivity stems from limiting a farmer from utilizing a multi – crop rotation plan. Restricting an effective crop rotation creates the potential of herbicide resistant weeds and makes it difficult to have an effective pest management plan.

In order to safely and effectively spray both quarters, I would ask you not to approve IWT locations 08, 09, 14, and 15. Removing these locations would allow an agriculture pilot to safely and effectively spray both quarters in an east/west direction. Maintaining IWT locations 21 and 22 would prevent applications in a north/south direction. On a similar note; IWT location 19 and the adjacent proposed permanent met tower PMM2 will forever prevent us from spraying 230 acres in a north/south direction located in Sections 16 and 21- 111-74 located to the south. We understand this and hope the PUC and Engie would recognize this as equitable concessions.

If you have any questions please give me a call. Thank you for your consideration.

Sincerely,



Michael J Bollweg  
Bollweg Farms  
Bollweg Family LLLP  
Tumbleweed Lodge  
Agronomist – '96 graduate SDSU  
[REDACTED]  
Harrold, SD 57536  
[REDACTED]  
[REDACTED]

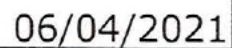




EXHIBIT 2

**Michael Bollweg**

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**From:** "Godt, Brandon" <Brandon.Godt@adm.com>  
**Date:** Monday, August 09, 2021 4:18 PM  
**To:** "Michael Bollweg" <tumbleweed@venturecomm.net>  
**Subject:** Sunflower Discounts and Pricing

Michael,

Per our conversation on the phone earlier, sunflowers are traded for bird food specs with a 28 lb test weight. For every half a pound below 28# there is a 15¢ per cwt discount, so 30¢ per lb below 28#. Once flowers get below 27# there are no buyers in the bird food market that are willing to accept them, therefore they are subject to rejection. This typically occurs when there is not adequate control of seed weevils.

Current prices for sunflowers are \$28.50 per cwt for nearby delivery and \$28.50 per cwt for new crop.

You have my permission to share this information and reprint.

Thank you,



**Brandon Godt**  
Location Manager  
ADM Harrold

ADM  
19723 321<sup>st</sup> Ave P.O. Box 64  
Harrold, SD 57536

t (605) 875.3278 / m (605) 220.2075

adm.com

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