

Below, please find Deuel Harvest Wind Energy South LLC's ("South Deuel Wind") First Set of Data Requests to Arla Hamann Poindexter. Please submit responses within 10 business days or promptly contact the undersigned to discuss an alternative arrangement.

- 1-1) Provide copies of all data requests submitted by PUC staff or any other party to you in this proceeding and copies of all responses to those data requests. Provide this information to date and on an ongoing basis.

Please see the attachments to the email for responses to PUC staff data requests and corresponding briefing paper submitted with that data request.

- 1-2) Identify the address of your permanent residence (where you reside).

My current permanent residence is at 18280 480th Ave, Clear Lake, SD 57226.

My husband and I have another address at 19491 346th Ave, Ree Heights, SD 57371. However, because of my mother's health and need for 24 hour/day supervision, I haven't spent more than 10 nights at the Ree Heights address in the last year.

- 1-3) Identify all property you own, or Hamann Family Farms LLC owns within one-half mile of the South Deuel Wind Project ("Project") Area and the location (by section, township, and range) of such property. Identify the location of any habitable buildings on the property.

**Hamann Family Farms LLC owns the following within the project area
15-114-49 NE ¼ Less N747.75 E610.5 & Less Hwy (Brandt Township)**

Hamann Family Farms LLC owns the following within ½ mile of the project area

32-115-48 SE ¼ (Clear Lake Township)

32-115-48 NE ¼ (Clear Lake Township)

33-115-48 W ½ (Herrick Township)

34-115-48 SW ¼ (Herrick Township)

35-115-48 S1/2 SE ¼ & SW ¼ Less OL1 & OL2 (Herrick Township)

35-115-48 OL2 in S ½ SW ¼ (Herrick Township)

2-114-48 Gov Lots 2-3-4 & SW ¼ NW ¼ (Norden Township)

3-114-48 Gov Lots 3-4 & S1/2 NW1/4 (Norden Township)

4-114-48 Gov Lots 3-4 S1/2 NW1/4 (Norden Township)

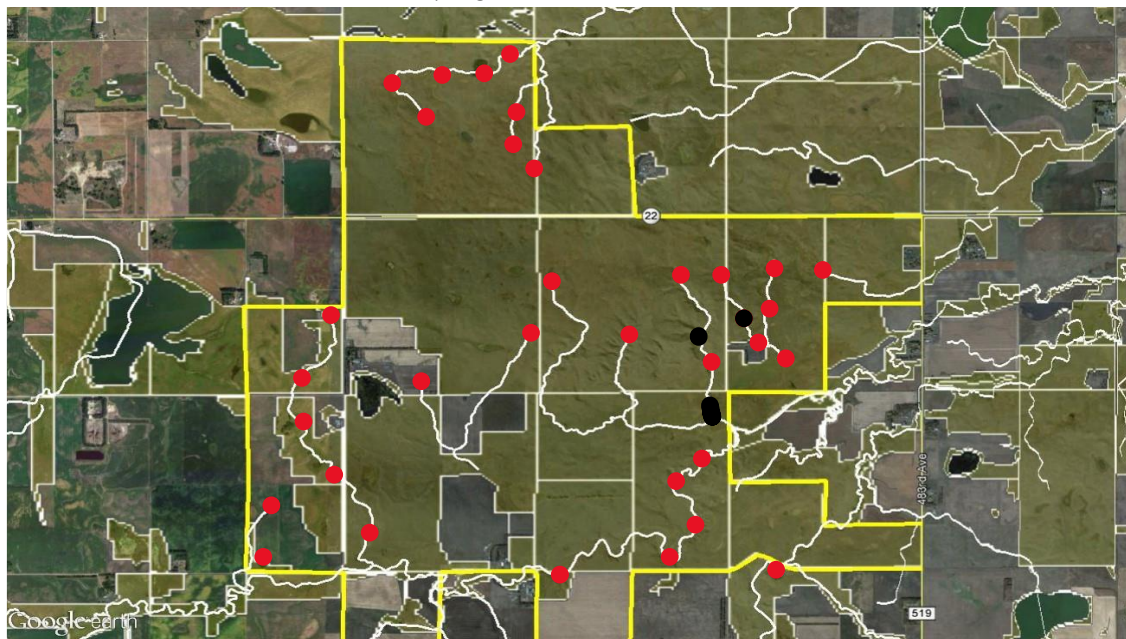
No building sites are on the above property.

- 1-4) Identify any sensitive or unique features of your property that you assert would be impacted by the Project.

Land owned by Hamann Family Farms LLC is home to several unique features. There are freshwater springs that are the headwaters of creeks that are prominent in Deuel County. The map below shows the ranch in 2017 (some land in Norden Township has

been added since then). Red dots represent freshwater springs. Black dots represent calciferous fens which are explained in the next paragraph.

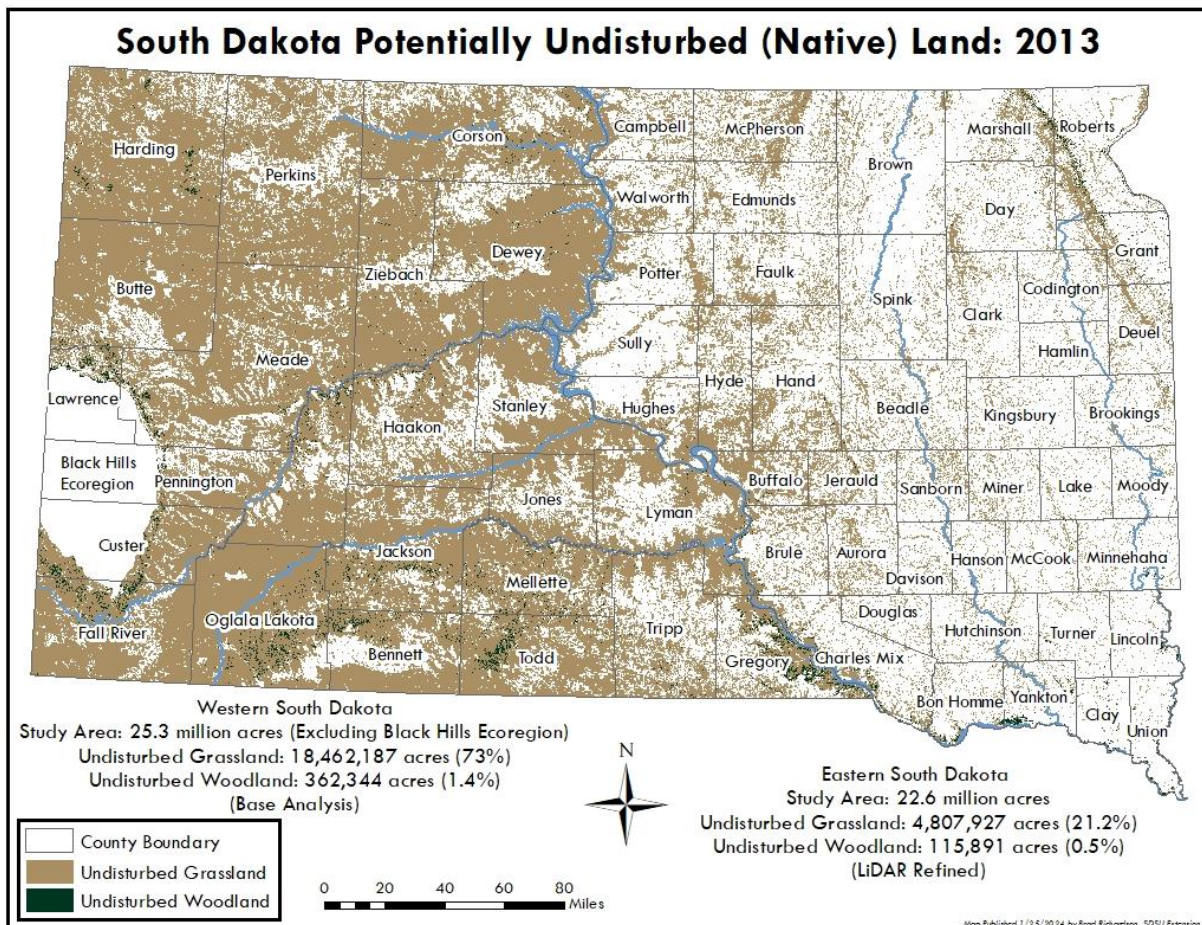
Blue Bell Ranch: 13 Headwaters/Freshwater springs in red, Fens in black



Deuel County has several calciferous fens. We know of at least 3 on land owned by Hamann Family Farms LLC (in black on above map). For perspective, the State of MN has only about 200 known fens. To quote the MN Department of Natural Resources webpage ([Calcareous Fens | Minnesota DNR](#)), these peat wetlands are “amazing, rare, irreplaceable”. The fens need a constant supply of upwelling groundwater that is rich in calcium and other minerals. Because it is calcium rich, there is a highly diverse unique rare plant community that can tolerate a low oxygen environment, calcium carbonate deposits, low nutrient availability and relatively cold organic soil. Calciferous fens are found in glacial outwash so the Coteau hills are prime locations. South Dakota Magazine published an article about these “Pearls on the Prairie” in the July/Aug 2021 magazine ([Pearls on the Prairie](#)). Minnesota has protected fens specifically in their drainage statutes because of the uniqueness that supports 7 endangered plants.

The fact that Hamann Family Farms LLC has unbroken sod is unique. According to research done by Pete Bauman, SDSU Extension Natural Resources and Wildlife Field Specialist, 1 of every 5 acres of eastern SD land is unbroken native sod. In the image below, we can see how the Coteau hills are essentially the last remaining acres in eastern SD. Land owned by Hamann Family Farms LLC is near the southern edge of the swath of unbroken prairie. The Audubon Society has called grasslands one of [America’s most endangered habitats \(Five Facts about Grasslands that Will Blow You Away | Audubon\)](#) while the World Wildlife Fund has called grasslands a critically

imperiled habitat worldwide ([Saving Our Grasslands: Why They Matter, Why We Are Losing Them, and How We Can Save Them | Publications | WWF](#)). Although the proposed project won't use grasslands for towers, I believe the wildlife and plant species deserve further setbacks to ensure their viability.



I am the 3rd generation in 70 years to operate the acres owned by Hamann Family Farms LLC. But in the last 25 years, we have become increasingly proactive in conservation for biodiversity. We've changed to a rotational grazing system and moved to May/June calving on pasture. On the grassland acres that are unbroken sod, we've seen diversity and plant populations increase. On grassland acres that were farmed prior to 1960, we've seen more native grasses and forbs. We've taken the most unproductive farmed acres and replanted native grasses. The ranch is protected through a permanent grassland easement through the US Fish and Wildlife Service. We donated the easement on land less than a mile into Minnesota to help USFWS Prairies Without Borders project protect more grassland acres in SD and MN.

The ranch is locally known as the Blue Bell Ranch (a traditional throwback paying homage to the Blue Bell Medicine Co that owned the ranch in the 1930s). In 2017, we

won the SD Leopold Conservation Award which recognizes a farming or ranching family annually for implementing the 5 principles of soil health: soil cover, limited disturbance, living roots, diversity and integrating livestock. These 5 principles are the cornerstones to healthy soil and water quality that promotes biodiversity and wildlife habitat ([Soil Health Organization in Pierre, SD | South Dakota Soil Health Coalition](#)). As part of the annual recognition, there's a YouTube video that spotlights some of the unique work on land owned by Hamann Family Farms LLC ([2017 South Dakota Leopold Conservation Award ~ Blue Bell Ranch](#)). Tom Tornow, who we worked with during his time at US Fish and Wildlife, is quoted in the video saying "there's upwards of 200 different species of different grasses and forbs in the native grass". Those native species provide resources for the hundreds of species in the animal kingdom and unknown amount of microbes working under the soil to permanently sequester carbon.

1-5) Describe, in detail, your concerns regarding the Project.

My main concern is that the community doesn't want the project. Several of the towers are going on property owned by property owners who do not reside in Deuel County. More residences in the project area are "non-participants" than "participants". Tower easements won't be an economic driver to Deuel County because so much of the land is owned by people outside of Deuel County; easement money likely won't be used here. There seems to be conflicting information about the taxes that will stay in Deuel County because of the project. Is Deuel County stuck with a 20-30 year project for only a decade's worth of tax revenue?

Most residents are non-participants. Yet they have to bear the burden of the project. Their roads will be used by semi trucks and heavy equipment. The residents will have to choke on dust from extra traffic on gravel roads. Their livestock and pets will get sick from pollutants from extra traffic. Residents won't get a respite from the sound of construction. And once construction is complete, residents will never see the horizon without flashing red lights and never listen to the sound of complete silence.

Complicating the construction phase of the wind tower is road construction. SD Hwy 15 south of Clear Lake isn't expected to be complete until sometime in 2025; wind project traffic will be diverted to county and township roads.

I have concerns about the risk of fire from wind towers. All fire departments in Deuel County receive tax money. But that alone is not enough for a department to operate annually. Fire departments are all volunteers and need adequate equipment and training; they especially need additional resources to be prepared for fires in and around towers. According to conversations with volunteer firefighters, Invenergy hasn't provided fire departments funding beyond taxes.

My second concern is the lack of complete information available to Deuel County residents. Only pre-project data is available. The wind industry has grown worldwide and yet there are few studies on the effects of wind towers at 1 year, 5 years, 10 years or 20 years post construction. Of the projects in Deuel County alone, the only “data” we have is hearsay and rumors. Invenergy hasn’t provided us with any county wide production numbers, let alone implications to the environment.

A couple of incomplete reports caught my attention. The grassland assessment that was attached to the application relies on one date in one year at the end of the traditional grazing season. The person completing the assessment used warm season grasses as a metric; cool season species were completely ignored because of the date. Because the assessment was completed after a killing frost in October, all native forbs had gone to seed and were most likely invisible during the assessment. The person who completed the assessment never left public roadways to accurately describe the species present on grasslands. In the real estate comparisons, several properties weren’t exactly comparable sales. Housing built dates were sometimes several decades apart; several sale dates were more than a year apart.

All information about potential concerns is based on 1 turbine. There is no information based on the health, safety or livability based on realistic projections. Several non-participant residences will have more than 4 towers within 1 ½ mile of the residence. What are the realities of construction or lifetime use of the turbines for this resident? Also, what is the effect of the project on small towns like Brandt and Toronto? These towns will be essentially completely surrounded by turbines. I could understand this lack of information if this was the first Invenergy project, but this will be Invenergy’s third project in Deuel County alone. The lack of information seems deceptive at worst and incomplete at best.

I have several personal concerns as well. I’m concerned that the gravel will be taken from the pit north of my/my mother’s residence. I’m worried about the safety of my mom’s caregivers as they share the road with extra traffic. My mom has lived in that house for over 50 years. Even as dementia has taken her cognitive and physical skills, her heart is a true rancher and conservationist. She loves watching the birds migrate and use the lake just south of the yard. She enjoys riding in the UTV and checking cattle. She expects that I know every vehicle that drives by. I worry the stress of the construction phase will cause her sleep problems, anxiety, and depression. I worry that she won’t understand why the horizon has become an industrial site and not an agricultural paradise.

I am concerned that 25 years of conservation efforts will be undone by construction and use of wind turbines. When we changed to May calving and rotational grazing, we saw better pasture utilization, more diversity of plant species, more species of birds and insects and more overall wildlife. The water is cleaner and more supportive to all non-vertebrate populations. Will my cattle graze the same patterns post construction

as now? Will they remain as healthy? Will the red wing blackbird that always follows me on “his” hill still have a home?

Please allow me to explain why soil health and water quality are so important to the acres I use. Conservation groups like to use fence line comparisons to visualize how a management practice can affect soil health and water infiltration within a few feet of a property line ([Rainfall Management on Doug Sieck's Ranch in North Central South Dakota](#) shows the differences on just one owner’s property). I saw this first hand when Hamann Family Farms LLC purchased a property in Section 2 of Norden Township in 2023. The previous owner used that property for haying and fertilized heavily. We were astonished in 2023 how few cool season grasses were present. There were essentially no forbs or warm season grasses. We used a rotational grazing plan on that property. In 2024 were surprised to see more plant diversity already. There were at least 4 prevalent warm season grasses and at least 10 forb species. The plants per square foot had increased substantially so there was almost no bare ground between plants. Unfortunately (but expectedly), we haven’t seen an increase in wildlife or bird populations yet. Based on our past experience implementing changes, I would expect to see an increase in about 2028. But the biggest surprise was the effect in Herrick Township. The calves in that pasture were 20-40 pounds heavier than other years and with less sickness. A positive change in Norden Township saw positive effects in Herrick Townships. So this begs the question: if we can make positive changes to the environment in 1-2 years, how fast can negative changes happen?

- 1-6) Describe what mitigation measures you believe would address the concerns you identified in response to Request 1-5.

The best mitigation measure would be for Invenergy to withdraw the application.

- 1-7) Identify any witnesses, including expert witnesses, you plan to have testify on your behalf. For each witness (including expert witnesses), please provide a resume or statement of qualifications of the witness(es), identify the subject matter regarding which the witness will testify, and identify and provide any exhibits the witness will refer to or introduce.

Unfortunately, I have not found any expert witnesses willing to risk losing their employment by testifying on my behalf. I do plan to submit published articles and research as appropriate.

- 1-8) With respect to your statements at the August 22, 2024, public input hearing, state all facts that support the statements you made and produce copies of all documents that support statements you made

I went to the PUC website and listened to the recording. So for clarity sake, I will note times with my comments and questions.

38:38 I introduced myself.

At 39:00 I made the comment about the grouse SD Game Fish and Parks found in our pasture 8 miles north of Highmore that had been identified under the wind towers about 7 miles south of Highmore the summer before.

My husband was leaving for work at about 8am and met a Game Fish and Parks employee at the door. My husband was literally opening the door as the GFP employee was going to knock; my husband was so surprised, he forgot to get a business card. I wasn't home at that time, but my husband called me immediately after he talked to GFP. The GFP employee asked for permission to go onto our property and ensure that the grouse was indeed there and see if the grouse had made a home there. The GFP was granted permission. Neither my husband nor I can remember the day or even the year, but it was in the spring and earlier than the 10 of June because there weren't any cattle in that pasture yet. My husband is willing to sign an affidavit that this conversation happened. Regardless, this grouse's experience seems to be consistent with the briefing paper that was attached to the discovery the PUC asked of me in Sept.

At 40:50 I asked about Invenergy paying for an independent environmental study.

At 41:04 I continued with a follow up comment about a personal experience with the person doing the study making the point that the study was only as good as the person doing the study.

Here's the backstory to that comment. Prior to any wind towers being built north of Toronto, there was a vehicle parked in one of our approaches on 480th Ave. I was on a 4 wheeler, but I stopped to make sure the occupant of the vehicle didn't have trouble with her pickup. I waited for about 5 minutes for her to get off her phone. When she did, I asked if she was having trouble. She explained that she was hired to do the bird survey and explained the basics of the survey. I asked about her education and her career goals. She seemed very knowledgeable about birds, but she seemed bored by the prospect of being in a vehicle with no one to talk to. As I left, I asked her to let us know if she saw anything unusual or unique. I never saw her again.

At 41:47 I asked about noise level and what a dBA was. I forgot to get the paper about noise levels after I asked my remaining questions.

At 42:40 I asked about the taxes that were staying in Deuel County and the school districts.

At 43:50 I asked who paid for upgrades to the roads because "some of these roads are barely roads". This is personal experience on the road between Clear Lake and Norden Township and Herrick and Norden Township. These roads are minimally maintained. Although no towers will be constructed using these roads, they are the only access

points to participating properties in the project. These roads are also adjacent to Hamann Family Farms LLC and I avoid them with a pickup after any weather event until I've traveled them with a ATV or UTV first. As I write this response on the 29th of Oct., there's grass that grew in the middle of these roads. They had standing water on them most of May and June.

At 45:25 I asked how many Invenergy employees lived in Deuel County which the project manager couldn't answer.

At 45:48 my final question was how close to your employees live to a wind tower. And then my questions were complete and I was past my allowed 5 minutes.

Dated this 31st Day of October, 2024



Arla R Hamann Poindexter