February 24, 2009

Sent Via E-mail: david.birkholz@state.mn.us with **WS-08-1134** in the subject line

David Birkholz
Minnesota Office of Energy Security
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Re: WS-08-1134

Dear Mr. Birkholz:

The following comments relate to Noble Flat Hill Windpark I, LLC's ("Noble") Site Permit Application for a Large Wind Energy Conversion System (LWECS) for the Noble Flat Hill Windpark I Project, and Noble's Route Permit Application for a new 230 kV Transmission Line and Collection System including Substation, in Clay County, Minnesota.

The first issue I want to address here is the lack of adequate notice. Notice was not given to residents in the greater area that may be potentially impacted by this large scale project. I live in the proposed transmission line and substation area and my first notice of the project was from your office on January 28, 2009, which indicates the date of the public information meeting of **February 4, 2008**. I recently learned of landowners in this area that were not notified.

Noble, Clay County, and local township government could have mailed a notice to each rural resident of the county, with particular diligence to notifying each resident in the project area.

Some of my neighbors saw an article in the Fargo Forum Newspaper on the day of the February 4, 2009 public hearing. I was told if it wasn't for a gentleman in Detroit Lakes, Minnesota alerting a Forum Newspaper reporter to this event it may have gone unnoticed by the media.

It should be noted in this rural area of Clay County the newspaper is <u>mailed</u> to Forum subscribers from Fargo, North Dakota, and is delivered by rural postal carrier in the mailbox along with regular mail.

The dates Noble reported its "public outreach efforts" were mainly in the summer when many residents are away from their homes, and in the fall, when many residents, especially those with children, are very busy with school and extra curricular activities. The time periods coincide with planting and harvesting in this rural community.

Local townships have chosen to put legal notices in more obscure newspapers such as the Hawley Herald, while the State of Minnesota published a Notice of Public Information and Scoping Meeting with the erroneous meeting date of **February 5, 2008** in the Fargo Forum. I believe it is burdensome for rural residents to have to subscribe to two or more newspapers in order to receive notice of public meetings when Noble, state, county, and township government

collectively have the resources to adequately inform the public. Perhaps the scale and impact of the project should dictate the type of notice required rather than the minimum that is presently required by law.

Another issue is the manner in which Noble met with certain landowners, specifically the farmer landowners and officers of townships (often one in the same) to obtain leases and rights of way for this large scale, multifaceted project. I choose to bring this to your attention because of the past actions of Noble and other wind energy companies in other states, such as New York. The manner in which Noble and the other wind energy companies go about the countryside in obtaining contracts is at a minimum questionable, and in my mind raises the possibility of illegal action. Also, Noble's financial situation should be closely scrutinized.

In relation to the siting of the wind turbines, I am most concerned with their close proximity to the "scattered residences" as Noble characterizes the nearby homes in its report. Likewise, the high voltage transmission line, Route 1, is close to "scattered residences" along State Highway 9 South on both the east and west side of the highway.

I acknowledge that green energy carries environmental costs, like the continued need for traditional, less clean energy when the wind is not blowing, and the miles of land needed for 400-foot wind turbines and 150-foot transmission towers. Prevention in the planning stages seems to be a better option than allowing the project to be built as proposed and dealing later with adverse impacts and complaints about noise, shadow flicker, safety and security.

I have researched wind turbines for my own use and from what I know siting a wind turbine closer than one mile to an existing home is just asking for trouble.

My home is situated about four miles downwind from the proposed turbines. I have tinnitus (ringing in the ears) almost on a daily basis which is exacerbated by the commercial trucks driving north and south on State Highway 9. The potential for noise pollution downwind from a wind generating facility will no doubt compound this ailment.

Negative health effects have been identified with wind turbine noise. Please see The Acoustic Ecology Institute's Special Report: Wind Turbine Noise Impacts, January 6, 2009. I will not repeat the results of the studies or sources here as the report is available on line. Please see, ***http://www.AcousticEcology.org/srwind.html***. Also, other landowners in the proposed wind turbine area may address this issue.

I have additional concerns related to the environmental impacts of this project, not only on the land, but on the people and wildlife that live on the land.

In particular, I would like to point out that representatives of the Nature Conservancy, and Buffalo River State Park, are naïve in stating they have no concerns as long as the project is sited to the west side of State Highway 9.

My property is on the east side of State Highway 9 South where I have an unobstructed view to the east and west. I have seen more wildlife in my backyard, front yard, and western farm land across the highway than I have ever seen on Nature Conservancy or Buffalo River State Park lands. I have documented the presence of the Greater Prairie Chicken, Trumpeter Swan, Pelican, Bald Eagle, Snowy Owl, Great Horned Owl, Cooper's, Northern Goss, Sharp-shin, Swainson, and Red-tail Hawk, Peregrine Falcon, a variety of Bats, Turkey, Pheasant, Dove, Pigeon, and many Canadian Geese. There are also shorebirds and many songbirds along this stretch of highway and adjacent farm lands.

I am very concerned about the hazards associated with power poles, transformers, and miles of transmission line on humans and animals. Recently Drs. Simona Carrubba and Andrew Marino concluded,

…EMFs were consistently transduced by essentially all the animal and human subjects with the requisite statistical reliability. After the first concerns that man-made electromagnetic fields in the environment might be a hazard to public health were raised almost 40 years ago (Becker, 1972; Adey, 1976), the main counter-argument was that the reported EMF-induced bioeffects were inconsistent, thereby indicating only the existence of inconspicuous experimental errors, not real biological processes. There never was any reliable evidence that the argument was true. Now, there is clear evidence the argument is false; magnetosensory evoked potentials elicited by EMFs can be detected in essentially every subject examined when the proper form of analysis is used (Carrubba et al., 2008). The Effects of Low-Frequency Environmental-Strength Electromagnetic Fields on Brain Electrical Activity: A Critical Review of the Literature**,** *Electromagnetic Biology and Medicine*, 27:83-101, 2008, Informa Healthcare, USA.

Also, the negative environmental impacts of wind turbines and their associated facilities is another area that needs to be addressed because of the large amount of petroleum products each turbine uses. I have seen statements to the effect that the project does not anticipate the release of emissions of hazardous air pollutants or volatile organic compounds. I don't think the captain of the **Exxon Valdez** oil tanker "anticipated" the release of 11,000,000 gallons of Alaska North Slope crude oil into Alaska's Prince William Sound and along a path stretching 470 miles to the southwest. But it did happen.

Public safety is a serious issue in the project because of its proposed rural location. There are no fire hydrants, no water tower, and only volunteer fire service. Other issues besides fire are turbine icing, blade failure, power surge, and lightning, to just name a few.

I believe this project will cause a reduction in property values and degrade the rural landscape. The wind turbines, power poles, and miles of transmission lines will be the new features in our view shed. That is not why I bought land in the country.

The claimed environmental benefits of wind energy are exaggerated because the facts show "wind farms" have significant adverse environmental, scenic, and property value impacts, while

producing few local economic benefits. The so-called local economic benefits Noble touts in its literature and documents will be overwhelmed by the higher costs imposed on electric customers through their monthly bills.

Like many citizens have discovered, tax avoidance and tax subsidies, not environmental and energy benefits are the primary motivations for building wind farms. The real winners in this are "wind farm" owners and the landowners who lease their lands.

A very important issue in this region is flooding, especially overland flooding from farm land. I believe the proposed wind turbine site will add to this problem because of the need for access roads, and concrete pads. It doesn't take a hydrologist to figure out where the water will go.

Noble provided some information about regional electrical service in its documents stating that their project is in the Otter Tail Power (a private company) service area. It is not. The area is served by Red River Valley Cooperative Power Association (RRVCPA), a not-for-profit cooperative. This cooperative and its wholesale power supplier, Minnkota Power Cooperative, have stated they are already well positioned to meet the renewable "25 by 25" mandate set forth by the state. RRVCPA distributes a diverse supply of electricity generated from coal, wind, water and biomass. Wind energy comprises about 23% of Minnkota's generation portfolio with more coming online later this year or early next year. In its Annual Meeting brochure, *SPARKS*, February/March 2009, the Chairman and CEO reported, *"…Like anything else, the cost to install turbines is becoming increasingly more expensive and costly new transmission lines must be built to deliver this energy to where it is needed. Furthermore, wind turbines are not reliable baseload energy (the type that powers your home 24/7). They only generate their rated electrical capacity about 49% of the time, meaning firm energy must be purchased or generated elsewhere much of the time."*

There are many alternatives to Noble's project that would produce renewable, green energy, which includes but is not limited to: solar, biomass, vegetable based oil, hybrid vehicles, effective energy conservation, higher efficiency standards, and planting more trees.

Another alternative is to wait for the CapX2020 project plans to be finalized for transmission lines and substations in this area.

Sincerely,

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