

From: Per Anderson [anderson@exchange.cord.edu]
Sent: Wednesday, May 06, 2009 2:19 PM
To: Larry Hartman
Cc: David Birkholz; Sandra Anderson; Per Anderson; permanderson@gmail.com
Subject: Lakeswind Comments and Request for Reply

Attachments: PUCHearing.pdf; ATT289704.htm; PUCContested.pdf; ATT289705.htm; Appendix 1.pdf; ATT289706.htm; Appendix 2.pdf; ATT289707.htm; Appendix 3.pdf; ATT289708.htm; Appendix 4.pdf; ATT289709.htm
Hello, Mr. Hartman,

Please find attached six documents I am submitting to OES and PUC as public comment on the Lakeswind Wind Power Plant (IP6603/WS-08-1449). The principal documents are 1) request for hearing for possible modification of the site permit, and 2) request for contested case hearing. The latter includes 4 attached documents in support of the request.

I am submitting these documents as PFD files. I hope that this format works with your process. I will be out of the country from May 8-20. If you could send me a reply indicating that the documents have been received in a useable form, I would appreciate confirmation. Please "reply all" to include Sandra Anderson who will have access to backup materials in case of problems while I am away.

Best,

Per Anderson

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218-233-0397

4 May 2009

To: Minnesota Public Utilities Commission

From: Per Anderson
2727-29th Avenue South
Moorhead, MN, 56560
permanderson@gmail.com

Re: Final Approval of Draft Site Permit for Lakeswind Wind Power Plant (IP6603/WS-08-1449)

Request for Public Hearing and Moratorium Concerning Modification of Draft Site Permit for Cause of Endangerment of Human Health or Possible Endangerment of Human Health

Pursuant to the modification of conditions rules of the draft site permit (III,K,3), I respectfully request that notice and opportunity for public hearing in Clay County be granted in the case of Lakeswind Wind Power Plant by PUC staff regarding possible modification of the permit for cause following release to the public of findings and recommendations of a review currently being conducted by the Minnesota Department of Health at the request of the Office of Energy Security for consideration by the Public Utilities Commission. The cause for modification is the endangerment of human health (III,K,3,b) or the possible endangerment to human health posed by approval of LWECS according to Minnesota Noise Standards (Minnesota Rules Chapter 7030).

The current review concerns the possibility of adverse health effects due to chronic and proximate exposure to wind turbine noise, including low-frequency sound pressures. The review addresses the endangerment of human health and is therefore relevant to the draft site permit for Lakeswind Wind Power Plant. The review is significant because it is the first scientific and medical inquiry by a state agency into the use of Minnesota Pollution Control Agency community noise standards and an A-weighted standard for the siting of industrial-scale wind turbines with respect to human populations.

This request for public hearing, if granted, may require a temporary moratorium on the final decision regarding the Lakeswind draft site permit. The moratorium would end when the findings and regulatory implications of the MDH review have been subject to public discussion and PUC response in Clay County. At that point, the PUC could extend this moratorium until unresolved issues concerning endangerment of human health within Clay County (and the State of Minnesota) have been resolved. PUC acceptance of this request for public hearing, citizen response, and a PUC moratorium is allowed by the rules of the draft site permit (III,K,11) and is grounded in the moral principle of precaution.¹

In the event that the findings of the review are inconclusive and that further scientific and medical research are needed to resolve questions about the endangerment of human health in the local presence of wind turbines, the PUC will be called upon to act upon open docket LWECS cases and future applications in a context where approval of LWECS under current noise standards may lead to morally unacceptable harm that is scientifically plausible but uncertain.

¹ For further consideration of the ethics of precaution, see <http://unesdoc.unesco.org/images/0013/001395/139578e.pdf>

Such a situation presents difficult but unavoidable moral questions about responding to the unknown. Does the PUC continue to regulate and act upon LWECS applications using Minnesota Noise Standards? Does the PUC declare a moratorium on approval of site permits until health questions have been answered decisively? Does the PUC adopt interim, stringent and precautionary noise standards to ensure that endangerment of human health is avoided or greatly diminished while research seeks definitive answers to current questions? Inconclusive findings that require further scientific and medical study will pose such questions for the PUC and the State of Minnesota.

This request for moratorium, notice, and public hearing under conditions outlined above is a request for responsible public deliberation about new and consequential matters regarding state approval of LWECS and the protection of public health in Minnesota. Thank you for considering this request.

4 May 2009

To: Minnesota Public Utilities Commission

From: Per Anderson
2727-29th Avenue South
Moorhead, MN, 56560
permanderson@gmail.com

Re: Final Approval of Draft Site Permit for Lakeswind Wind Power Plant (IP6603/WS-08-1449)

Request for a Contested Case Hearing Regarding Information Relevant to the Lakeswind Wind Power Plant Site Permit Application

I respectfully request a contested case hearing where citizens ask questions and receive information from representatives of Project Resources Corporation (PRC), the Minnesota Department of Natural Resources (MnDNR) and U.S. Fish and Wildlife Service (USFWS) regarding the site permit application presented to the PUC in December 2008. Given the change of the project site announced by OES on 7 April 2009, I further request that the PUC direct PRC to provide at this hearing a revised turbine siting plan with an opportunity to submit written comment to the PUC.

The purpose of the hearing would be consideration of information relevant to a final approval of the draft site permit, including relevant information omitted from the application submitted to the PUC in December 2008. The information would be of two kinds: first, written and oral recommendations to PRC from the MnDNR and USFWS regarding siting decisions to protect the natural resources in the proposed project area and, second, information about bases in the environmental sciences for the 34-tower siting plan included in the December 2008 application and for the revised turbine plan. The main question at stake in the request is whether on 12 February 2009 the PUC acted upon a recommendation from the Energy Facility Permitting staff of the Office of Energy Security concerning an application that omitted important information relevant to state norms for LWECs siting. If so, the contested case hearing is needed to bring forward further information germane to final approval of the draft site permit.

Minnesota law requires that LWECs siting be undertaken “in an orderly manner compatible with environmental preservation, sustainable development, and the efficient use of the resources” (Minnesota Statutes 216F.03). Minnesota Administrative Rules (7836.0500) require that an “applicant for a site permit shall include with the application an analysis of the potential impacts of the project, proposed mitigative measures, and any adverse environmental effects that cannot be avoided” in a number of areas including wildlife and rare and unique natural resources. The draft site permit contains several conditions with respect to wildlife and natural habitat protection (III.C.4,5,6;III.D.1).

The draft site permit also outlines conditions under which the PUC can modify, revoke, or suspend a permit (III.K.3,4). Pending the requested hearing, I make no recommendation about PUC response should the application omit information relevant to the action of the PUC on 12 February 2009. I make no judgments about decisions made by the author(s) of the application. I make no claims of misconduct by any party to the situation. In the interests of transparency and due process, I do wish to raise questions about the performance of the applicant in the site permit application process.

During the public information meeting for Lakeswind Wind Power Plant on 29 April 2009, I raised nine questions about omitted information (see Appendix 1) and received no answers from PRC at that meeting. The issues for the hearing are a public matter. To date, they have not been answered in public or in writing to me by PRC, hence, the request for a contested case hearing. Given that the omitted information concerns wildlife and habitat impacts, representatives from the MnDNR and USFWS (preferably case officers) need to be present to answer questions at the hearing.

Before turning to specific informational issues regarding the application, an important dimension of the project must be noted. The draft site permit authorizes Lakeswind Wind Power Partners, LLC (permittee) to construct a 60-MW LWECS. The application submitted in December 2008 includes a 34-tower site plan with needed infrastructure. The application states (A,1) that "PRC has obtained lease agreements with landowners for all land within the project site that is required for the Project." The application claims, tacitly, that the 34-tower plan is buildable because the participating properties are leased and available for development. The issues raised below raise questions whether the project as presented in the December 2008 application is buildable as proposed.

To complicate matters, on 7 April 2009, OES gave public notice that the Lakeswind project boundary had been increased by 2500 acres (13%). Since this notice, PRC has not released a revised tower plan to the public and appears to have no intention to do so (a permissible action within state rules). The public record indicates that PRC intends to build between 17-35 turbines. PRC has ignored two email requests from me on 20 April 2009 and 23 April 2009 for specific information about number, size, and placement (again, a legally permissible response). However, the project boundary change can only mean that the 34-tower plan presented to the PUC in December 2008 has changed and perhaps significantly.

The draft site permit makes clear that PRC is not required to submit a complete site plan to the PUC (or the public) at this time (III.A.1). As a Minnesota citizen, I find this lack of transparency regarding key characteristics of the project unreasonable and antithetical to citizen interests in public accountability. PRC has no proprietary interest to protect since the site has been secured for development. The PUC could require PRC to disclose this information (III.K.11). If this contested case hearing request is accepted, I request the PUC to direct PRC to disclose its revised turbine plan to the public so that the informational issues of the hearing can be considered and resolved.

The hearing is needed because PRC elected not to address these informational issues at the public information meeting on 29 April 2009. As indicated, these issues are relevant to the site permit application submitted to and accepted by the PUC. Further, the hearing is needed to consider informational issues relevant to a final approval of the draft site permit. MnDNR and USFWS representation are needed to speak to the informational issues. A revised site plan is needed to determine whether the informational issues related to the 2008 application have been resolved with an amended site plan or whether they remain.

I turn now to the informational issues to be addressed at the hearing. First, there are informational issues regarding recommendations from the MnDNR omitted from the site permit application. In a letter to Jennifer Shepard at Terracon (PRC's consultant) dated 12 September 2008 (Appendix 2), Lisa Joyal raises a number of issues and asks Terracon to address them in the site permit application.

1. The letter, written in response to a request for a Natural Heritage review, notes the presence of "several Sites of Biodiversity Significance" within and adjacent to

the project site. The application omits the following recommendation: “We encourage you to consider project alternatives that would avoid direct impacts to these ecologically significant areas.” In a section on mitigative measures (18c), the application quotes without attribution a 12 September recommendation on “Best Management Practices” that follows the recommendation to consider alternative project sites. The application adopts one recommendation and omits mention of the other. Why? Despite the silence of the application, did PRC consider alternative project sites, as recommended by the MnDNR? If so, why not?

2. The 12 September letter discusses the Blanket Flower Prairie SNA and asks that the site permit application “include a determination of whether or not the project as proposed has the potential to impact the SNA, the rare features the SNA supports, or the public use of the SNA. If so, avoidance and protection measures must be proposed.” Again, the application omits this recommendation and does not include the requested determination. The application does include a recommendation about avoiding calcareous fens in its discussion of mitigative measures (18c). The application, again, is selective concerning MnDNR recommendations. Why?
3. The letter requests a copy of the preconstruction biological preservation survey as required by the draft site permit (III.D.1) and makes a further recommendation (again omitted from the application): “Given the wind project’s proximity to the above Sites of Biodiversity Significance, the number of prairie remnants within the project area, the general population declines of many grassland birds, and the potential for wind turbines to cause avian mortality, we also encourage pre- and post-construction avian monitoring.” Because the draft site permit requires the survey, compliance with this MnDNR request can be expected and is promised in the mitigative measures section (18c). Why does the application omit reference to a pre- and post-construction avian monitoring? Does PRC intend to do such monitoring?
4. Finally, there is the issue of prairie remnants. In its application, PRC pledges to “avoid disturbance” of native remnants (18c); it “does not anticipate directly impacting the ecologically significant areas” within the project (18b). It says it will “avoid placement of turbines in high quality native prairie land” (17c). The MnDNR letter states the position of the agency that “all prairie remnants merit protection.” It recommends against turbine placements within a half-mile of prairie remnants and recommends against building related infrastructure on prairie remnants. “If applicable,” the letter requests a copy of the native prairie protection plan. The draft site permit indicates that this is required upon request of the PRC. Has such a plan been requested by the PUC? If so, does PRC plan to follow the MnDNR recommendation (omitted from the application) that the “plan should include measures to avoid impacts to native prairies and measures to mitigate for impacts if unavoidable”?
5. The matter of prairie remnants and draft site permit is an issue because the 34-tower plan submitted with the site permit application shows nine turbines directly sited on prairie remnants (as indicated in the Minnesota County Biological Survey) in Sections 1, 2, 12, and 22 of Tansem and Section 35 of Parke (Appendix 4). How are these placements consistent with statements in the application that promise prairie remnant avoidance? Is PRC saying that these placements are not placements on prairie? As a site permit applicant, PRC is expected to offer an analysis of the impacts of the project, proposed mitigative measures, and any adverse environmental effects that cannot be avoided. In the

case of native prairie, the application and the 34-tower site plan provided with the application do not appear to supply consistent information. If so, the application does not fully meet PUC norms for analysis of the potential impacts of the project, proposed mitigative measures, and any adverse environmental effects that cannot be avoided. A revised turbine plan is needed to determine whether PRC is meeting conditions for the draft site permit.

Second, there are informational issues regarding recommendations from USFWS that involve both omission of information relevant to the site permit application and the bases in the environmental sciences for the 34-tower siting plan included in the December 2008 application. Regarding USFWS recommendations omitted from the application, the application indicates that PRC “will continue to work with” both the MnDNR and USFWS “during the course of the Project” (18c). The application mentions contact with USFWS (18, 18c) but omits mention of USFWS response.

Through a Freedom of Information Act request, I have received a USFWS letter from Tony Sullins to Matthias Weigel at PRC, dated 28 October 2008 (Appendix 3). The application does not mention or quote contents of the 28 October letter, which was received prior to submission of the site permit application. As the contents of the letter establish, this information is relevant to the norms for site permit application.

The letter summarizes topics covered during a July conference call prior to a subsequent presentation of a siting plan. These topics included WMAs, WPAs, and USFWS easements, regulations for easements, greater prairie-chicken lek locations and buffers, and project timeline. The letter shows that PRC subsequently presented a siting plan for 34 turbines and transmission lines (given the timing, probably the plan submitted with the application). USFWS makes two recommendations about this plan:

First, “Avoid placing turbines and associated infrastructure on wetland or grassland easements, or adjacent to such easements or waterfowl production areas. Some turbines in the preliminary proposal located on Service easements; these locations should be re-evaluated to ensure that these sites minimize overall project impacts and do not adversely influence the intent and parameters of the easements.”

Second, “Greater Prairie Chicken avoidance. Avoid placing turbines within 5 miles (8 km) of known leks.”

After reading this letter, I requested and received information about USFWS easements within the project site from Scott Kahan. The project area includes about 40 easements, with about 30 on the west side. There are at least nine turbines in the December 2008 plan sited on or adjacent to USFWS easement properties (Appendix 4). The easements in question are wetland easements with covenants and protections regarding the wetland basins. These easements generally do not prohibit turbine placements on surrounding uplands provided they do not degrade the protected wetland, particularly its hydrology.

In the case of the USFWS letter, I see an agency recommendation against placement of turbines on or near easement properties (including uplands) consistent with the intentions of easement programs. Further, I see a request for reconsideration of some proposed turbine placements on easement properties. PRC was notified of USFWS’ position on this matter prior to submission of the site permit application, and the PUC and the public should be informed of the status of this notice. Because 25% of the turbines in the December 2008 site permit application are sited on or near easement properties, the notice represents a possible problem with the project as proposed to the PUC. Does the request for reconsideration in the USFWS letter refer to a problem or

possible problem with respect to wetland covenants and protections? If so, was this problem resolved prior to submission of the site permit application to the PUC? If not, is the problem resolved at this time? Further, why did PRC propose turbines on or near easement properties against the recommendation of USFWS? Does the revised turbine plan involve placements on easement properties? If so, what are the potential impacts and what mitigative measures are being proposed?

Finally, the proposed turbine placements of the December 2008 application do not comply with the USFWS recommendation of a 5-mile buffer from prairie-chicken leks (Appendix 4). On what grounds does PRC reject USFWS guidance? What is the scientific basis for PRC placements? I have communicated previously (26 August 2008) with PRC about the 5-mile guideline and about the existence of a lek in Section 14 of Humboldt Township. I count 5 towers within 3 miles of this lek. (My 40-acre parcel in Section 7 of Tansem, two miles from this lek, is used by prairie-chickens in late fall and winter.) According to the annual survey coordinated by Brian Winter for the MnDNR, there are established leks in Section 11 of Tansem, Section 7 of Scrambler (Ottertail County) and Sections 31 and 32 of Cormorant (Becker County). Last year, these four leks held 48 males. According to the site plan in the PUC application, there are 15 towers within two miles of the lek in Tansem 11, 10 within 2 miles of Scrambler 7, and 13 within two miles of Cormorant 31. In 2008, a new lek (one male) was discovered in Section 21 of Tansem. There are 11 towers within 2 miles of this lek (which is holding two males this spring according to Mr. Winter).

The USFWS 5-mile setback is an interim recommendation established in 2004. The recommendation is grounded in scientific knowledge. Important new studies of habitat fragmentation, turbine avoidance, and other questions are under way. New USFWS guidelines are under development. Lacking expertise in the conservation sciences, I will not comment on the soundness of this recommendation. I leave this for USFWS officers and other experts to address. My concern is procedural. LWECs developers should honor the recommendations of the MnDNR and USFWS. If they choose to reject these recommendations and are allowed by law to do so, they should do so with reasons grounded in sound science.

In the case of Lakeswind, the December 2008 site permit application omits mention of two recommendations that would render the project as proposed unbuildable. The recommendations raise serious questions that receive no attention in the application. These recommendations have bases in the conservation sciences, which provide the authority for environmental impacts and mitigation in the State of Minnesota. Since the December 2008 tower plan tacitly rejects the recommendations of USFWS, what are the scientific bases for the December 2008 tower plan (and for the revised tower plan)? PRC is an agent of environmental change and is required to justify its action in terms of "an analysis of the potential impacts of the project, proposed mitigative measures, and any adverse environmental effects that cannot be avoided."

The site permit application does not mention that the project site includes a number of established leks. It does not discuss impacts to prairie-chicken populations and habitats and does not discuss mitigation measures. Accordingly, it does not offer a scientific rationale for turbine siting decisions with respect to prairie-chickens. The application makes one non-specific reference to turbine avoidance: "A reduction of use of the area within 100 meters (328 feet) of the wind turbines by some bird species may also result" (19). The issue is acknowledged but not addressed in detail or with scientific support.

The silence of the December 2008 site permit application about prairie-chicken leks is a problem because relevant information from USFWS has been omitted and because the

question should be addressed in an impact analysis for an LWECS site that includes robust prairie-chicken populations supported by extensive grasslands, many secured by the USFWS easements program. By omitting reference to prairie-chicken impacts, the site permit application may lead the reader to conclude that prairie-chicken conservation is not an issue within the project site. The silence of the application is a problem that needs attention at the requested contested case hearing.

In conclusion, this survey of informational issues provides grounds for a contested case hearing. This hearing is needed to bring forward for public consideration important and relevant project information that has been omitted or underdeveloped in the December 2008 site permit application and that has changed since the project boundaries were enlarged in April 2009. This information is a matter of public interest and is relevant to the further decisions by the PUC. Thank you for consideration of this request.

Citizen Comment and Questions
Public Information Meeting
Lakeswind Wind Power Plant
PUC Docket: IP6603/WS-08-1449
29 April 2009

My name is Per Anderson. I am a landowner in Tansem Township. I am a member of Clay County Citizens for Sustainable Energy.

I have communicated with Project Resources Corporation on two subjects: human health and habitat for grassland birds, specifically, prairie-chickens. I have questions tonight about habitat, but first a word about human health.

In response to citizen comment in Clay County and Freeborn County and at the request of the Office of Energy Security, the Minnesota Department of Health has undertaken a 90-day study of scientific and medical literature regarding adverse health effects experienced by some people due to chronic and proximate exposure to low-frequency sound energy generated by industrial-size wind turbines. This review with recommendations will inform open docket decisions before the Public Utilities Commission and future decisions. The findings will be released to the public in May or June.

OES and MDH should be applauded for investigating health effects. Commissioner Magnan has indicated in writing to me and to our state legislators and county commissioners that the data merit public investigation. The MDH review challenges the position of the American Wind Energy Association, which continues to mislead the public, saying it "takes health concerns seriously" but there is "no reliable evidence that low-frequency sound from a turbine is a problem."
(http://www.awea.org/pubs/factsheets/Wind_Turbines_and_Health.pdf). This stance is also contrary to the National Research Council of the National Academy of Sciences, which recommends study of low-frequency sound effects (*Environmental Impacts of Wind-Energy Projects*, 2007, 158-9). The MDH review is significant in other respects as well.

The Clay County Planning Commission and the Board of Commissioners will address health effects when they act upon a new wind turbine ordinance under development. This is also a significant response to new questions, and Clay County officials should be applauded for taking them seriously.

Citizens here tonight who want to know more about health issues should go to www.windturbinesyndrome.com for starters. Look at the data yourself and get engaged with the state and county process. Contact our elected officials.

I turn now to grassland bird habitat. Minnesota is a leader in natural resource preservation. For decades, conservation agencies and NGOs have done excellent work to conserve and reclaim wetlands and grasslands that continue to decline nationally. Grassland birds are most threatened due to habitat loss and fragmentation. Less than 1/10th of one percent of the original Tall Grass

Prairie in Minnesota remains. Clay County has the most prairie in the state (10%).

According to a new report by USFWS (*The U.S. State of the Birds*), farmland conservation programs provide the best hope for birds and other wildlife. In our area, conservation groups and agricultural producers have cooperated for decades to find a balance between croplands, grasslands, and wetlands. The Black Swamp WPA in Tansem is a recent example of cropland restored to grassland and wetland. CRP in Tansem is another example.

The easement programs of USFWS also allow producers to participate in conservation. Unlike townships to the north and west, Tansem has few WMAs and WPAs. However, on the west side there are about 30 easements (about 40 in the project area). The permanency and number help to halt habitat loss and fragmentation in Tansem.

Greater prairie-chickens (state-listed species of concern) require habitat connectivity across large spaces to maintain genetic diversity. West Tansem easements provide connectivity between the populations of East Tansem, Cormorant, and, Scrambler townships, the birds of Humboldt, and those north and south along the Agassiz Beach Ridge.

Modern habitat gains in Clay County have been impressive. The abundance of easements in Tansem says that many landowners are conservationists as well as producers—not to mention producers who participate in other conservation programs.

Native plant and animal habitats are protected under state and federal laws and best practices of the conservation sciences. Law enforcement falls upon the MnDNR and USFWS. For example, turbines can kill birds and bats through collision if improperly sited, and the Migratory Bird Treaty Act holds wind projects accountable for migratory bird deaths.

My questions for Lakeswind are not about mortality due to turbine collisions. They are about supporting bird populations through genetic diversity and successful nesting. We need to guard against turbine placements that fragment grasslands and separate populations, and that degrade established mating and nesting habitats due to turbine avoidance.

To avoid threats to grassland birds, wind developers should honor the recommendations of conservation agencies. For example, native prairie (which supports 1/3 of the listed species in the state) does not have legal protection in Minnesota. The MnDNR consistently recommends protection of prairie remnants. In its application, PRC pledges to “avoid disturbance” of native remnants (18c); it “does not anticipate directly impacting the ecologically significant areas” within the project (18b). It says it will “avoid placement of turbines in high quality native prairie land” (17c).

However, PRC is not honoring key recommendations of the MnDNR and USFWS and is not keeping its pledge to the PUC about prairie protection. (I must say

the change in the project site three weeks ago and the absence of a revised turbine plan complicate my contention. PRC ignored two requests for a revised plan prior to this meeting, so I can only respond to the 34-turbine plan of the December 2008 application.)

First, I have questions about site selection and evaluation. USFWS guidelines call for developers to begin their process with multiple sites and to evaluate them comparatively according to a prescribed protocol. The goal is to identify high and low quality wildlife areas and to select accordingly.

1. Please describe PRC's process (or Terracon's) of selecting the proposed project site. Were other sites considered and were wildlife and habitat impacts considered in this process?
2. In the Description of Resources (16a), the application states, "The most important land use at the Project site today is agriculture. Native flora persists in fragments." How would PRC rate the wildlife and habitat quality of the proposed site—high, medium, or low quality?
3. Since selecting the current site and contacting the MnDNR and USFWS, has PRC considered moving the project to a location with lower wildlife and habitat quality? How have project boundaries been set with a view to wildlife and habitat concerns? Why have they recently been expanded by 13%?

I have a copy of the 12 September 2008 letter sent by MnDNR to Terracon in response to a request for a Natural Heritage review. This letter (quoted in part in the application) notes the presence of "several Sites of Biodiversity Significance within and adjacent to the proposed project boundaries."

The letter goes on to recommend (and this is omitted from the PRC application): "We encourage you to consider project alternatives that would avoid direct impacts to these ecologically sensitive areas." The MnDNR letter asks Terracon to address this issue in the PUC application. I see no attention to this issue.

Next, the MnDNR letter addresses the Blanket Flower SNA and refers to it as a site of "High Biodiversity Significance." Once again, the application omits mention of a MnDNR recommendation: "The PUC Site Permit Application should include a determination of whether or not the project as proposed has the potential to impact the SNA, the rare features the SNA supports, or the public use of the SNA. If so, avoidance and protection measures must be proposed."

I see no "determination" in the application, unless the issue is addressed in the one-sentence impact statement of Section 18 on Rare and Unique Natural Resources: "PRC does not anticipate directly impacting the ecologically significant areas within the Project site."

PRC should not omit MnDNR recommendations from its application. The MnDNR request to consider an alternative project site is a serious issue. In the case of Noble Flat Hill, an open docket project proposed north of Glyndon, the

MnDNR made the same recommendation to consider project alternatives when the Natural Heritage review found “Sites of Biodiversity Significance” and one site of “Outstanding Biodiversity Significance” in a project site proposed for Agassiz Beach Ridge.

Over the next year, USFWS and The Nature Conservancy communicated similar concerns about Noble Flat Hills, including loss of high quality habitat and fragmentation. USFWS noted the project was sited in the path of a greater prairie–chicken corridor being established by the MnDNR between Crookston and Big Stone. These letters are attached to and quoted in the Noble Flat Hill application.

As a result of site reviews, Noble Environmental Power moved the project several miles to the west, avoiding impacts to 23 state– and federally–listed species. This is an important precedent in Clay County of a developer honoring the recommendations of conservation agencies. Subsequent letters from USFWS and TNC indicate support for the location of Noble Flat Hill insofar as it is located outside high quality habitat areas. I see no evidence of support from any conservation agency in the Lakeswind application. If there are conservation officials here tonight, perhaps they can comment on this matter.

Second, I have questions about site development. USFWS sets forth ten recommendations for site development once the site has been selected. In its September 12 letter, the MnDNR says, (again omitted from the application) “Given the wind project’s proximity to the above Sites of Biodiversity Significance, the number of prairie remnants within the project area, the general population declines of many grassland birds, and the potential for wind turbines to cause avian mortality, we also encourage pre– and post–construction avian monitoring.”

In this regard, the Lakeswind application states, “Development of the wind power plant, including the construction and operation of the project, is expected to produce a minimal impact to the wildlife. Based upon studies of existing wind power projects in the United States and Europe, the greatest impacts to wildlife would occur to avian and bat populations. The impact of the Project on resident wildlife is expected to be minimal. There is potential for avian and bat collisions with the turbines” (17b). There is no mention in the application of pre– and post–construction avian monitoring as requested by MnDNR. The claim that wildlife impacts are expected to be minimal is unsupported.

The application does mention “PRC will conduct a pre–construction inventory of existing biological resources, native prairie, and/or wetlands in the Project site, if necessary” (18c). This inventory is actually required by the PUC permit. The section on Biological Preservation Survey (III.D.1) reads: “The Permittee, in consultation with DNR and other interested parties, shall conduct a preconstruction inventory of existing wildlife management areas, scientific and natural areas, recreation areas, native prairies and forests, wetlands, and any other biologically sensitive areas within the site and assess the presence of state– or federally–listed or threatened species. The results of the survey shall

be submitted to the PUC and DNR prior to the commencement of construction.” The status of this inventory is important to evaluating the 34-turbine plan in the application.

4. Has the required pre-construction inventory been completed? If not, what remains to be done?
5. What about pre- and post-construction avian monitoring as requested by the MnDNR? Is PRC acting on this recommendation? If so, please describe the timing and scope of pre-construction monitoring.
6. Is PRC preparing a prairie protection and management plan as outlined in the PUC site permit (III.C.6)? If so, does PRC plan to follow the MnDNR recommendation (omitted from the application) that the “plan should include measures to avoid impacts to native prairies and measures to mitigate for impacts if unavoidable”?

Regarding the last question, please comment upon the three turbines proposed for Section 22 in terms PRC’s pledge to “avoid disturbance” of native remnants (18c) and to “avoid placement of turbines in high quality native prairie land” (17c). The Minnesota County Biological Survey shows a large dry prairie remnant and a dry prairie-woodland complex on this site. The application says, again, “PRC does not anticipate directly impacting the ecologically significant areas within the Project site” (18b). Similarly, please comment upon the turbine placements on prairie remnants in Sections 1, 2, and 12 of Tansem and Section 35 of Parke. Please explain how these placements are not directly impacting ecologically significant areas.

Lastly, I have questions about PRC’s response to USFWS. The application indicates that PRC “will continue to work with” both the MnDNR and USFWS “during the course of the Project” (18c). Through a Freedom of Information Act request, I have a USFWS letter to PRC, dated 28 October 2008. The application mentions contact with USFWS (18, 18c) but omits mention of USFWS response. It does not quote the 28 October letter, which was received prior to submission of the site permit application.

The letter summarizes topics covered during a July conference call prior to a subsequent presentation of a siting plan. These topics included WMAs, WPAs, and USFWS easements, regulations for easements, greater prairie-chicken lek locations and buffers, and project timeline. The letter shows that PRC subsequently presented a siting plan for 34 turbines and transmission lines (probably the plan submitted with the application). USFWS makes two recommendations about this plan:

First, “Avoid placing turbines and associated infrastructure on wetland or grassland easements, or adjacent to such easements or waterfowl production areas. Some turbines in the preliminary proposal located on Service easements; these locations should be re-evaluated to ensure that these sites minimize overall project impacts and do not adversely influence the intent and parameters of the easements.”

Second, "Greater Prairie Chicken avoidance. Avoid placing turbines within 5 miles (8 km) of known leks."

To recall, the project area includes 40 easements, 30 in the west. I have communicated with PRC about a lek in Section 14 of Humboldt. I count 5 towers within 3 miles of this lek. (My land, two miles from this lek, is used by prairie-chickens in late fall and winter.) According to the annual survey coordinated by Brian Winter for the MnDNR, there are established leks in Section 11 of Tansem, Section 7 of Scrambler (Ottertail County) and Sections 31 and 32 of Cormorant (Becker County). Last year, these four leks, all established, held 48 males. According to the site plan in the PUC application, there are 15 towers within two miles of the lek in Tansem 11, 10 within 2 miles of Scrambler 7, and 13 within two miles of Cormorant 31. In 2008, a new lek (one male) was discovered in Section 21 of Tansem. There are 11 towers within 2 miles of this lek (which is holding two males this spring according to Mr. Winter).

7. Why does the application omit the recommendations of USFWS? Why should this omission not be viewed as suppression of information relevant to the PUC draft site permit?
8. Are proposed turbines and lines currently placed on easement properties? Are any adjacent to easements? I see proposed towers on or adjacent to easements in Sections 5, 15, 17, 20, and 22. If so, is PRC planning to comply with USFWS directives?
9. Proposed turbine placements do not comply with the USFWS recommendation of a 5-mile buffer from prairie-chicken leks. On what grounds does PRC reject USFWS guidance? What is the scientific basis for PRC placements?

Thank you.

Per Anderson
2727-29th Ave S
Moorhead, MN 56560
218-233-0397
permanderson@gmail



Minnesota Department of Natural Resources

Division of Ecological Resources, Box 25

500 Lafayette Road

St. Paul, Minnesota 55155-4025

Phone: (651) 259-5109 Fax: (651) 296-1811 E-mail: lisa.joyal@dnr.state.mn.us

September 12, 2008

Ms. Jennifer Shepard
Terracon Consultants, Inc.
3535 Hoffman Road East
White Bear Lake, MN 55110

Re: Request for Natural Heritage information for vicinity of proposed Lakeswind Wind Power Project

NHNRP Contact #: ERDB 20080368-0002

County	Township (N)	Range (W)	Sections
Becker	138	43	19, 30, & 31
Clay	137	44	1-30
Clay	138	44	19-36
Otter Tail	137	43	6, 7, 18-21, & 28-30

Dear Ms. Shepard,

As requested, the Minnesota Natural Heritage Information System has been queried to determine if any rare species or other significant natural features are known to occur within an approximate one-mile radius of the proposed project. Based on this query, several rare features have been documented within the search area (for details, see the enclosed database reports). Please address the following issues in the Public Utilities Commission (PUC) Site Permit Application for this project.

- The Minnesota County Biological Survey (MCBS) has identified several Sites of Biodiversity Significance within and adjacent to the proposed project boundary. Sites of Biodiversity Significance have varying levels of native biodiversity and are ranked based on the relative significance of this biodiversity at a statewide level. Factors taken into account during the ranking process include the number of rare species documented within the site, the quality of the native plant communities in the site, the size of the site, and the context of the site within the landscape (please see the enclosed MCBS Guidelines for further information). These particular Sites contain several rare plants; greater prairie-chickens (*Tympanuchus cupido*), a state-listed species of special concern; the regal fritillary (*Speyeria idalia*), a state-listed butterfly species of special concern; and several native plant communities including Pin Oak-Bur Oak Woodlands, native prairie remnants, and calcareous fens. (GIS shapefiles of MCBS Sites of Biodiversity Significance and MCBS Native Plant Communities can be downloaded from the DNR Data Deli at <http://deli.dnr.state.mn.us/index.html>.) We encourage you to consider project alternatives that would avoid direct impacts to these ecologically significant areas. In addition, Best Management Practices should be implemented in order to minimize indirect impacts such as the introduction or spread of invasive plant species.

Please note that the Blanket Flower Prairie Scientific and Natural Area is located within a Site of High Biodiversity Significance in T137N R44W Sections 11 & 14. (Shapefiles of Scientific and Natural Area Boundaries can be downloaded from the DNR's Data Deli website at <http://deli.dnr.state.mn.us/index.html>.) Scientific and Natural Areas (SNA) are legally designated public nature preserves established to protect the state's rarest natural features and sensitive resources. These natural areas are given the highest level of protection and the utmost consideration in assessing potential impacts from nearby projects. The PUC Site Permit Application should include a determination of whether or not the project as proposed has the potential to impact the SNA, the rare features the SNA supports, or public use of the SNA. If so, avoidance and protection measures must be proposed.

- As noted above, several calcareous fens are located within the project area. Sterile sedge (*Carex sterilis*), hair-like beak-rush (*Rhynchospora capillacea*), and whorled nut-rush (*Scleria verticillata*), all state-listed threatened plants, have been documented within these fens. Calcareous fens are rare and distinctive peat-accumulating wetlands that are legally protected in Minnesota (see attachment). Calcareous fens are designated as “outstanding resource value waters” in water quality regulations administered by the MPCA (Minnesota Rules part 7050.0180) and they are given special protection through Minnesota Rules part 8420.1010 - 8240.1060. The Wetlands Conservation Act, authorized by Minnesota Statutes 103G.223, states that calcareous fens may not be filled, drained, or otherwise degraded, wholly or partially, by any activity, except as provided for in a management plan approved by the Commissioner of the Department of Natural Resources. Many of the unique characteristics of calcareous fens result from the upwelling of groundwater through calcareous substrates. Because of their dependence on delicate groundwater hydrology, calcareous fens can be indirectly affected by activities several miles away from the fen.

Wind turbines and associated infrastructure should completely avoid calcareous fens and should not alter the hydrological conditions in the surrounding area. If this is not possible and it is determined that the project will adversely affect the calcareous fens in any way, you will need to consult with Doug Norris, DNR Wetlands Program Coordinator, at 651-259-5125. In addition, if the project will impact any of the fens, you will need to contact me before construction is initiated to discuss the endangered and threatened species permitting process.

- Also, as noted above, the project area contains several prairie remnants. In the mid-1800s, eighteen million acres of prairie covered Minnesota. Given that more than 99% of this prairie habitat has been destroyed and more than one-third of Minnesota's endangered, threatened, and special concern species are now dependent on the remaining small fragments of Minnesota's prairie ecosystem, we feel that all prairie remnants merit protection. We are also concerned with potential impacts to the grassland birds that depend on these remaining prairies, as many of these species are declining in number nationwide. For instance, there is some evidence to suggest that grassland birds, including greater prairie-chickens, are deterred from nesting in otherwise appropriate habitat by the presence of tall structures in the vicinity. As such, we recommend that wind turbines not be placed on or within at least ¼ mile, and preferably ½ mile, of prairie remnants. In choosing routes for access roads and utilities, we also recommend that you avoid native prairie remnants.

If applicable, please send me a copy of the native prairie protection and management plan (Section III.C.6. of the Site Permit). The plan should include measures to avoid impacts to native prairie and measures to mitigate for impacts if unavoidable.

- Trumpeter swans (*Cygnus buccinator*), a state-listed threatened species, have also been documented in the vicinity of the proposed project. The trumpeter swan was a widespread but uncommon breeder throughout the prairies and parkland regions of Minnesota. By the 1880's, however, trumpeter swans had disappeared from the state due to overhunting and the loss of habitat. Subsequent reintroduction and recovery efforts have been successful, but the long-term viability of the population is still unknown. Continued threats to the trumpeter swan population in Minnesota include lead poisoning, illegal shooting, the loss or degradation of wetland habitat, and collisions with transmission lines.
- A bald eagle (*Haliaeetus leucocephalus*) nesting area has been documented in T138N R45W Section 36 and near Tansem Lake in T137N R44W Section 27. Bald eagles are a state-listed species of special concern, and they are federally protected under the Migratory Bird Treaty Act and under the Bald and Golden Eagle Protection Act. Both acts prohibit killing, selling, or otherwise harming eagles, their nests or eggs. For assistance in determining whether an activity may disturb nesting bald eagles, please refer to the following USFWS website: <http://www.fws.gov/midwest/eagle/guidelines/index.html>.
- Please send me a copy of the Preconstruction Biological Preservation Survey (Section III.D.1. of the Site Permit) required by the PUC. Given the wind project's proximity to the above Sites of Biodiversity Significance, the number of prairie remnants within the project area, the general population declines of many grassland birds, and the potential for wind turbines to cause avian mortality, we also encourage pre- and post-construction avian monitoring.

- Barnesville Wildlife Management Area (WMA) is located on the western edge of the project boundary. (Shapefiles of the WMA boundaries can be downloaded from the DNR's Data Deli website at <http://deli.dnr.state.mn.us/>.) We recommend a minimum ¼ mile setback from all WMAs. Please contact the Area Wildlife Manager, Don Schultz at 218-739-7576, to discuss any additional information or concerns he may have about the project.
- There are also several USFWS Waterfowl Production Areas within the project area. If you have not done so already, I encourage you to contact the USFWS Twin Cities Field Office at 612-725-3548.

The Natural Heritage Information System (NHIS), a collection of databases that contains information about Minnesota's rare natural features, is maintained by the Division of Ecological Resources, Department of Natural Resources. The NHIS is continually updated as new information becomes available, and is the most complete source of data on Minnesota's rare or otherwise significant species, native plant communities, and other natural features. However, the NHIS is not an exhaustive inventory and thus does not represent all of the occurrences of rare features within the state. Therefore, ecologically significant features for which we have no records may exist within the project area.

The enclosed results include an Index Report and a Detailed Report of records in the Rare Features Database, the main database of the NHIS. To control the release of specific location information, which might result in the destruction of a rare feature, both reports are copyrighted.

The Index Report provides rare feature locations only to the nearest section, and may be reprinted, unaltered, in an environmental review document (e.g., EAW or EIS), municipal natural resource plan, or report compiled by your company for the project listed above. If you wish to reproduce the index report for any other purpose, please contact me to request written permission. **The Detailed Report is for your personal use only as it may include specific location information that is considered nonpublic data under Minnesota Statutes, section 84.0872, subd. 2. If you wish to reprint or publish the Detailed Report for any purpose, please contact me to request written permission.**

Please be aware that this letter focuses only on potential effects to *rare natural features*; there may be other natural resource concerns associated with the proposed project. This letter does not constitute review or approval by the Department of Natural Resources as a whole. If you would like further information on the environmental review process, please contact your Regional Environmental Assessment Ecologist, Paul Stolen, at 218-308-2672.

An invoice in the amount of \$181.09 will be mailed to you under separate cover within two weeks of the date of this letter. You are being billed for the database search and printouts, and staff scientist review. Thank you for consulting us on this matter, and for your interest in preserving Minnesota's rare natural resources.

Sincerely,



Lisa Joyal
Endangered Species Environmental Review Coordinator

enc. Rare Features Database: Index Report
Rare Features Database: Detail Report
Rare Features Database Reports: An Explanation of Fields
Fact sheets: MCBS Guidance, Calcareous Fens

cc: Don Schultz, DNR
Paul Stolen, DNR
Matt Langan, DNR
Laurie Fairchild, USFWS



United States Department of the Interior

FILE COPY

FISH AND WILDLIFE SERVICE
Twin Cities Field Office
4101 American Blvd. E.
Bloomington, Minnesota 55425-1665

October 28, 2008

Mr. Matthias Weigel
Project Resources Corporation
625 8th Avenue SE
Minneapolis, Minnesota 55414

Dear Mr. Weigel:

We have reviewed the most recent project plans and turbine configuration for Lakeswind Power, a proposed windfarm located in Clay and Otter Tail Counties. This letter provides a summary of the U.S. Fish and Wildlife Service's (Service) coordination on the proposed project thus far and provides recommendations to avoid impacts to fish and wildlife resources.

In a teleconference held July 16, 2008, to discuss the monitoring report and its effect on the Service's concerns regarding avian avoidance and mortality, the attendees agreed that the next step would be to evaluate a preliminary siting plan for individual turbines and associated infrastructure. The July 16 discussion focused on:

1. Location of state and federally owned lands (Wildlife Management Areas and Waterfowl Production Areas, and the Service's conservation easements in relation to potential turbine sites;
2. the rights and restrictions covering land use and Service habitat easements and the difference between wetland and grassland easements;
3. current location(s) of Greater prairie chicken leks and buffers to avoid adverse impacts to this species;
4. project timeline.

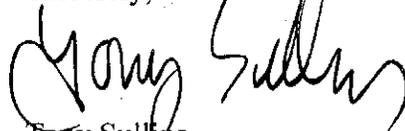
Our most recent information indicates that the project includes 34, 1.5MW turbines. Collector lines from the individual turbines to the main transmission lines will be located underground and each turbine will require an access road and a temporary construction zone of undetermined size. According to information provided in your September 19, 2008, discussion with project biologist, Ms. Laurie Fairchild, the amount and exact location of transmission line is dependent upon the use of either a 69kv (underground) or a 115 kv (overhead) carrying capacity. If the transmission lines are 115kv, the routes will follow those roadways with existing lines and right-of-way easements, but may require a second set of poles.

Based upon the project as currently proposed (see attached map showing proposed turbines and National Wildlife Refuge and State DNR lands) and the habitat and wildlife resources within the area, we are providing the following recommendations to avoid and minimize adverse impacts:

1. Avoid placing turbines and associated infrastructure on wetland or grassland easements, or adjacent to such easements or waterfowl production areas. Some turbines in the preliminary proposal located on Service easements; these locations should be re-evaluated to ensure that these sites minimize overall project impacts and do not adversely influence the intent and parameters of the easements.
2. Greater Prairie Chicken avoidance. Avoid placing turbines within 5 miles (8km) of known leks.

We look forward continuing coordination as the project moves forward. If you have questions regarding these comments, please contact me at (612) 725-5548.

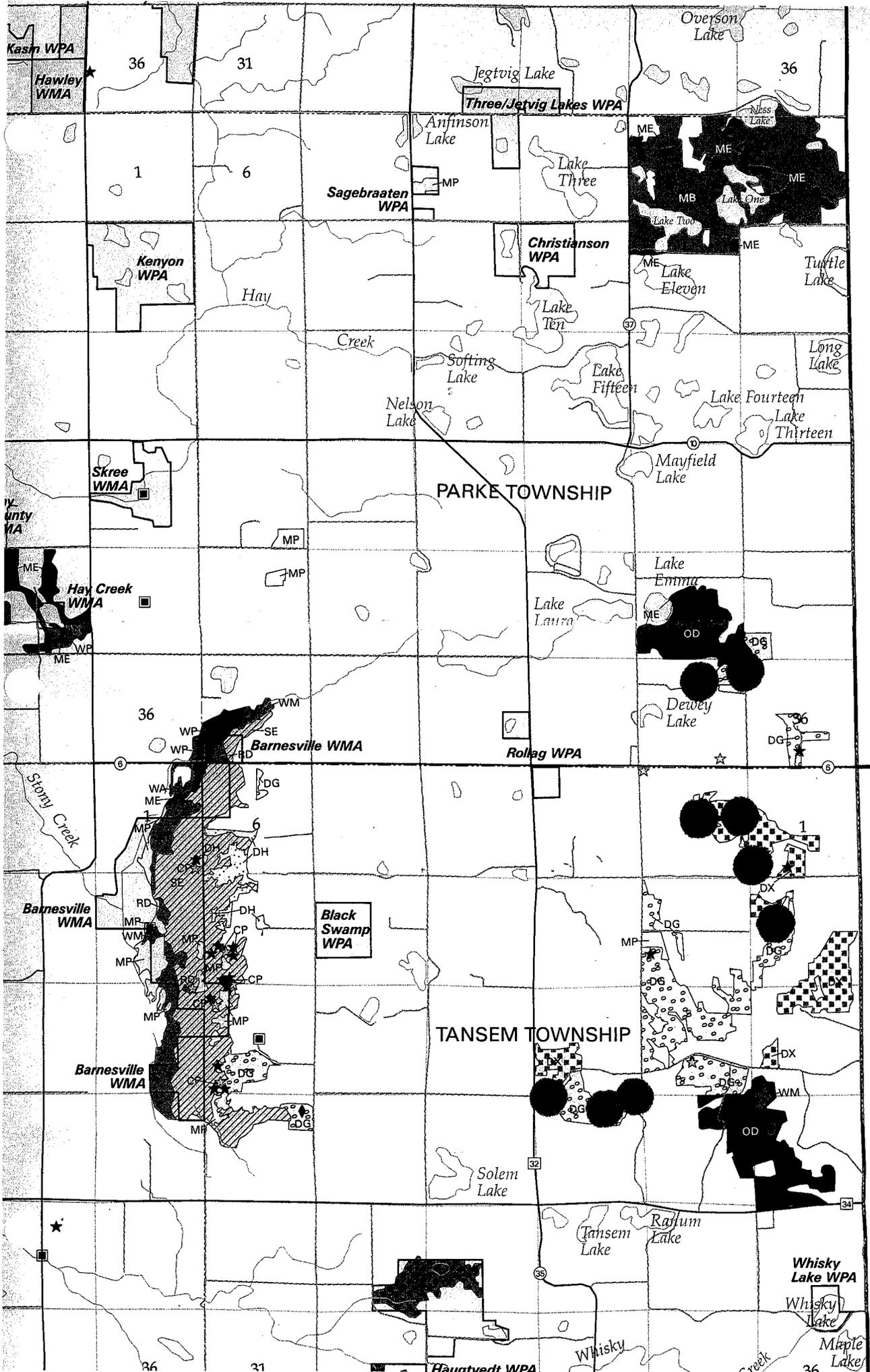
Sincerely,

A handwritten signature in black ink, appearing to read "Tony Sullins", written over a printed name.

Tony Sullins
Field Supervisor

cc: Scott Kahan, Detroit Lake WMD
Kevin Brennan, Fergus Falls WMD

Attachment



T138N

BECKER COUNTY

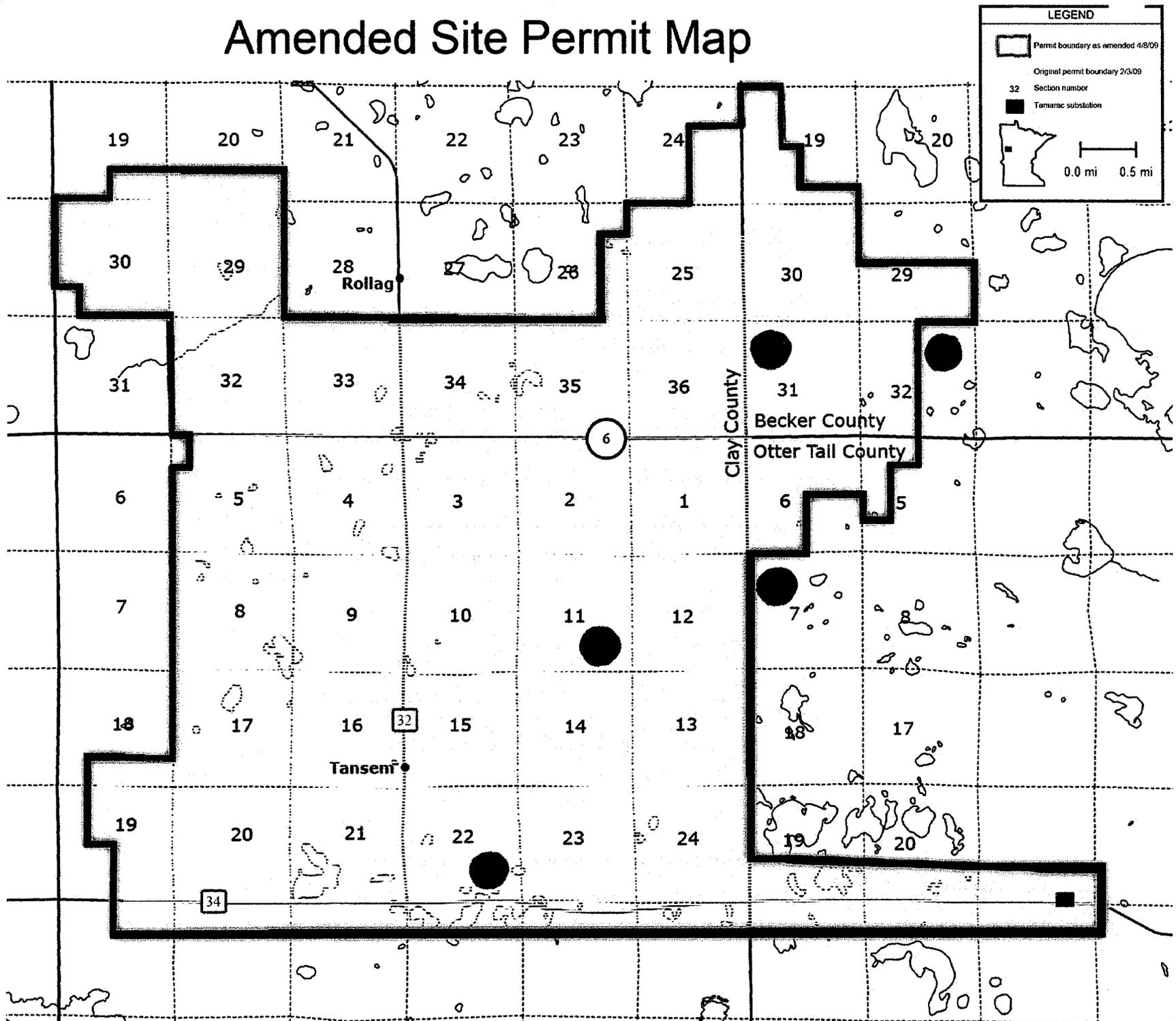
OTTERTAIL COUNTY

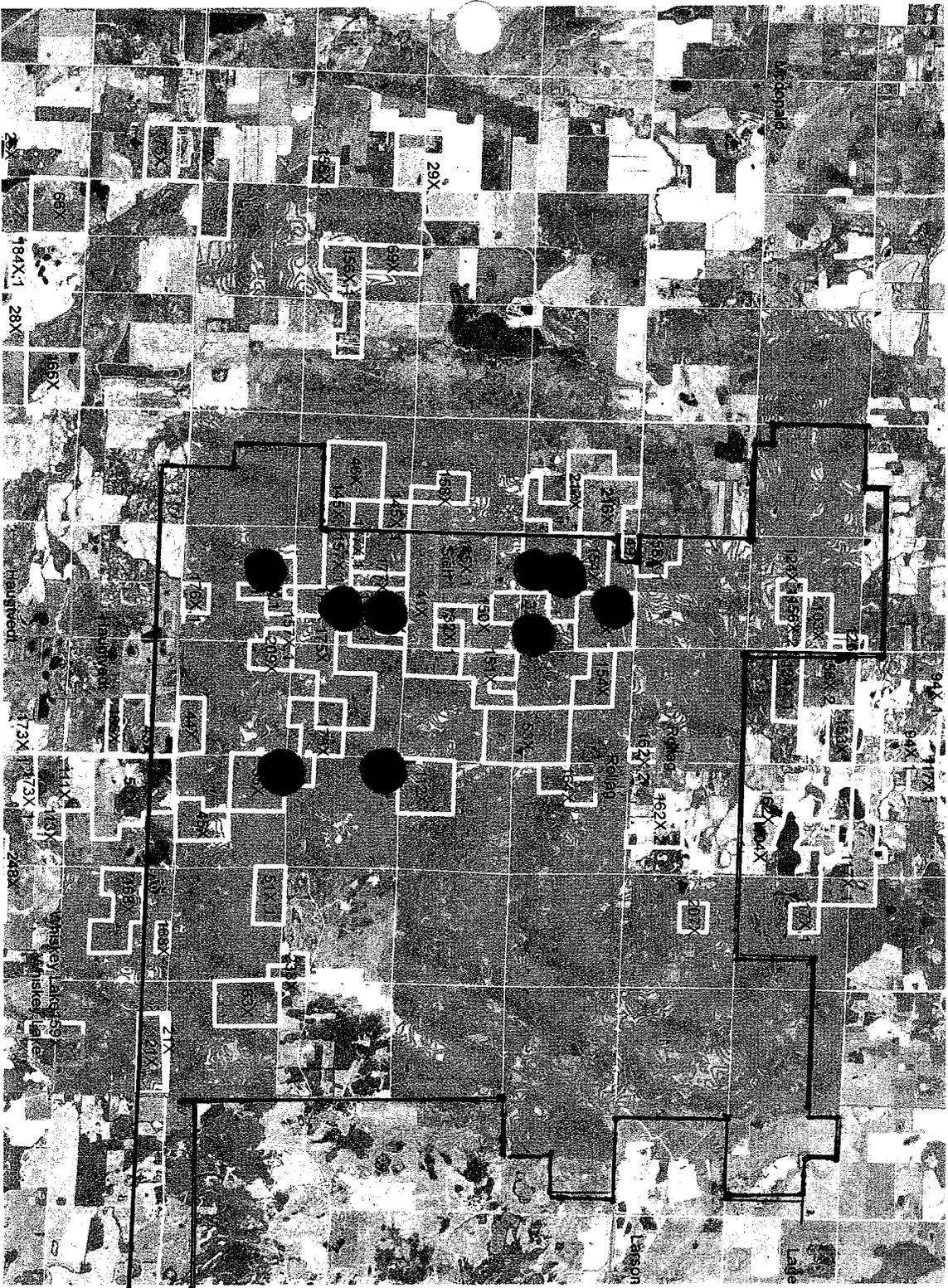
T137N

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Map legend and additional text on the right edge of the page.

Amended Site Permit Map





From: Larry Hartman [Larry.Hartman@state.mn.us]
Sent: Wednesday, May 20, 2009 5:27 PM
To: Larry Hartman
Cc: Paul White
Subject: FW: IP6603/WS-08-1449

From: cliff & linda [mailto:2bangs@rrt.net]
Sent: Sunday, March 22, 2009 7:31 PM
To: Larry.Hartman@state.mn.us; david.birkolz@state.mn.us
Subject: IP6603/WS-08-1449

Dear Mr. Hartman,

In regards to the Proposed Lakeside Wind Power Plant, we are landowners within the project area and support both the project and the development of alternative energy sources.

sincerely

Cliff & Linda Bang

john

From: "john" <jcbfarms@rt.net>
To: <jon.evert@co.clay.mn.us>
Sent: Wednesday, March 11, 2009 11:51 AM
Subject: wind towers in clay county

hello, I am John Bergseid ,I live at 25667 110 av s hawley mn in parke township, i also have land in tansem township and I am in favor of the lakeswind energy wind towers, project resources company. This project will be a huge financial boost to the area and the county. Sure the towers will alter the landscape but in a positive way. I feel the towers are aesthetically pleasing to look at and in no way devalue the area. most of the people i have talked to feel the same way and we should not let a single person or small minority dictate what goes on in the county. thank you

Lakes wind energy Project
docket 1 P-6603/WS-08-1499

4/29/2009

john

From: "john" <jcbfarms@rrt.net>
To: <sen.keith.langseth@senate.mn>
Sent: Wednesday, March 11, 2009 12:29 PM
Subject: lakeswind energy

we are in favor of the lakeswind energy windtowers, project resources company. the project involves wind towers in tansem and parke townships in se clay county. the project will be a huge financial boost to the area and the state. the towers will alter the landscape but in a positive way. We feel the towers are aesthetically pleasing to look at and in no way devalue the area.

john m bergseid john c bergseid elva bergseid marion bergseid engel bergseid
25667 110 av s hawley mn 56549

Docket 1P-6603/WS-08-1499

Larry Hartman

From: David Birkholz
Sent: Monday, April 20, 2009 10:17 AM
To: Larry Hartman
Subject: FW: Lakewind docket #: IP-6603/WS-08-1449

From: hnymnrsdandm@aol.com [mailto:hnymnrsdandm@aol.com]
Sent: Friday, April 17, 2009 7:24 PM
To: David.Birkholz@state.mn.us
Subject: Fwd: Lakewind docket #: IP-6603/WS-08-1449

-----Original Message-----

From: hnymnrsdandm@aol.com
To: larry.hartman@state.mn.us; david.birkolz@state.mn.us
Sent: Fri, 17 Apr 2009 11:55 am
Subject: Lakewind docket #: IP-6603/WS-08-1449

Office of energy security
Energy facility permitting
MN Dept. of commerce
85 7th place east Suite 500
St. Paul, MN 55101-2198

April 17, 2009

Dear sirs:

My name is Wendell D. Blatchford. I am a land owner in rural clay county, MN. and a taxpayer. I am also a member in the lakewind development in the planning and permit stages of the process. We are residents of ND.

Without going into all the things you have most likely already heard about the positives of this project, I will only be brief and say that as a soon to be 75 year old married man with children, grand children, step children, step grand children. WE have enjoyed our little bit of MN. by snowmobiling, sleigh riding, berry picking and firewood cutting, I am also a veteran and we are all VERY MUCH IN FAVOR OF THIS PROJECT. Especially after the economic situation has caused a very negative hit on our nest egg as retired folks basically living on a fixed income. Our property is currently rented to a nearby buffalo rancher. We can hardly wait to be able to take a picture of the buffalo grazing around a wind turbine----kind of--a before and after situation. Most of our property is native timber and grass.

We are, as most likely others involved in the project, are looking at this as our own personal "STIMULUS BAILOUT!!! However I think all of MN is involved positively.

6/18/2009

I was glad to read in our local newspaper---fargo forum-- that the MN Public Utilities Commission had granted a certificate for CapX2020 project. I take this as a good sign!!
Also one day earlier an article in the same paper concerning the states 'Green jobs' was very interesting.

We plan to be at the meeting on the 29th of april and hope to see you there.

sincerely

wendell and marnie Blatchford
2610 18th st. so.
Fargo. ND 58103
email hnymrdsandm@aol.com

Thank you for taking time to read this and I surely hope you can look favorably on this

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Why pay full price? [Check out this month's deals on the new AOL Shopping.](#)



85 7th Place East, Suite 500, St. Paul, MN 55101-2198
main: 651.296.4026 tty: 651.296.2860 fax: 651.297.7891
www.commerce.state.mn.us

STATE OF MINNESOTA
OFFICE OF ENERGY SECURITY
ENERGY FACILITY PERMITTING
PUBLIC INFORMATION MEETING COMMENT FORM

LAKESWIND WIND POWER PLANT PROPOSED BY SOUTHWEST
LAKESWIND POWER PARTNERS, LLC
PUC Docket No. IP6603/WS-08-1449

Name: Larry & Susan Blomster
Address: 14733 Hwy 31 S.
City: Hawley State: Mn ZIP: 56549

Please share your comments on the application and draft site permit to limit potential impacts, and mitigation measures to be considered in the record of this proceeding.

Turn this form in tonight or mail to the address provided on the back (use additional sheets as necessary). You may also email comments to Larry Hartman, Project Manager at: larry.hartman@state.mn.us with IP6603/WS-08-1449 in the subject line or you may submit comments on-line at <http://energyfacilities.puc.state.mn.us/>. Comments must be received no later than 4:30 p.m., Wednesday, May 20, 2008.

We are landowners within the Lakeswind proposed wind energy site. We are one hundred percent in favor of this project. As a nation we are past due at pursuing alternate forms of energy. We are concerned about our dependency on foreign sources of energy, not only for ourselves, but for our children and grandchildren. We view this project as a progressive step to safeguard energy sources for future generations. If those who oppose this project are doing so simply because they don't want anything in their back yards, they are not

Signature: Susan Blomster Date: 4/29/09
Concerned with progress on the betterment of our Country.

From: lekre [lekre031451@rrt.net]

Sent: Saturday, May 16, 2009 2:32 PM

To: Larry.Hartman@state.mn.us

Subject: IP6603/WS-08-1449

My father, Robert Aakre, who passed away 17months ago was so looking forward to the wind power being a thing of the future. It is our endeavor to may it come true.

We as a family have always tried to be conservatives and think this is the way the Lord wants us to be. Therefore it is our hope that The Lakes Wind Project will be approved and made available for years to come.

Thank you,

Linda & Ron Ekre
3422 190th St S
Hawley, MN 56549
Phone 218-937-5570



85 7th Place East, Suite 500, St. Paul, MN 55101-2198
main: 651.296.4026 tty: 651.296.2860 fax: 651.297.7891
www.commerce.state.mn.us

STATE OF MINNESOTA
OFFICE OF ENERGY SECURITY
ENERGY FACILITY PERMITTING
PUBLIC INFORMATION MEETING COMMENT FORM

LAKESWIND WIND POWER PLANT PROPOSED BY SOUTHWEST
LAKESWIND POWER PARTNERS, LLC
PUC Docket No. IP6603/WS-08-1449

Name: Lisa Gibb
Address: 12372 280th St. S
City: Hawley State: Mn ZIP: 56549

Please share your comments on the application and draft site permit to limit potential impacts, and mitigation measures to be considered in the record of this proceeding.

Turn this form in tonight or mail to the address provided on the back (use additional sheets as necessary). You may also email comments to Larry Hartman, Project Manager at: larry.hartman@state.mn.us with IP6603/WS-08-1449 in the subject line or you may submit comments on-line at <http://energyfacilities.puc.state.mn.us/>. Comments must be received no later than 4:30 p.m., Wednesday, May 20, 2008.

enclosed is copy I sent before, but I want to include that 50% of electricity is produced by coal, which pollutes the ^{air's} environment. We need to develop clean alternative sources, so why is now any question? Let's get away from foreign sources & go green here @ home. Save our environment
Signature: [Handwritten Signature] Date: 4/29/09 for our children,

Lisa Gibb <lisagibb@rrt.net>
copy of letter to county commissioner, state politicians
March 12, 2009 8:33:46 AM CDT
projectresources.net



LAKESWIND DOCKET # 17-6603/WS-08-1449

Lisa Gibb
12372 280th St. S
Hawley, Mn. 56549
218-937-5574

Dear Sir;

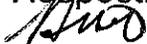
A good day to you and hopefully all will be blessed with a slow spring thaw after the recent snow we've had this winter. I pray that our communities will be spared of the flooding predictions.

I lived my entire life in Clay County Minnesota; gone to school in this area; I worked as a bus driver and later as a nurse; raised three children into adulthood. I actually live 12 miles from where I was born so I claim to have heavy ties to this area as my great grandparents settled in the region in the late 1880's. I believe that recent generations know very little what early life was like for our ancestors, as my parents got their first car in the 1950's and I do remember the first TV in our house. Classmates in my grade school were just starting to get electricity into their houses and huge power lines were starting to string across the fields outside town from western North Dakota. As I was graduating from high school, the interstate was being constructed and man had landed on the moon! So much had happened in my grandparents lifetime from horse and buggy to spaceships rocketing into hostile space.

Little prairie towns started losing their coal generated power plants for heating and lights and the coal shutes into basements for boilers were replaced by gas and fuel oil furnaces, a much more convenient source of heat. We in the states did not have the water source as Canada had for generating electricity cheaply from their rivers and American nuclear plants became popular in larger metropolitan areas. So as the population continues to grow and the demand for energy increases, what do I as a consumer want for my children and my grandchildren? I want to be a good steward of the earth and must weigh the pros and cons with each source and it's potential, it's short comings and it's costs. Ethanol appears to have a impractical "catch 22" situation and future generations will need to continually develop and improve an electrical car with a battery that can sustain a decent charge for a prolonged length of time. This part of the country especially has vast areas to cover for the average midwest citizen in their daily travels for work, school, shopping, medical care and recreation as you already are aware of.

Several years ago now, a company "Lakeswind Project Resource Corporation" sent a representative to every neighbor around Rollag and expressed an interest in developing electrical producing turbines along the old Lake Agassiz eastern shore line because of the wind potential. After living in my farm for 35 years, the area has changed from small farms with most of the milking parlors gone and many families needing to commute into town for the extra check needed to keep the family surviving. We have gravel pits every few miles now supplying the Red River Valley infrastructure. There are towers everywhere where the old timers joked that our township should be renamed to Tower Township from Tamsen Township. After discussing with the turbine company, I see no reason **not** to allow a company to pursue this venter into the future with a source of power that will not cloud the sky with a haze from coal or have the potential nuclear hazardous waste concerns. With future cost of oil again returning upward with demand that is inevitable, if this country is to survive, we need to become independent of foreign energy sources. Coal is near, but is dirty to our atmosphere with it's greenhouse emissions. I know the concerns of wind generator "noise", the visual look that some may find distasteful, and the bird/bat migration problems which to me may be the biggest worry. However, I do not see that New York Airports have stopped any flights because a Canadian goose caused a jet plane to crash land in the Hudson River recently. Progress goes on even though some may suffer unforeseen events; and it is good to examine all facets of potential problems. In this case however, where does the concern of a few individuals out weigh the need of clean reasonable energy when the government is involved with their regulations for the good of the whole. I think that Lakeswind have been able to find investors into a project that is based on sound engineering resources, have strived to meet studies requested in the name of environmental wholesomeness and attempting to provide a product that would benefit all with a product we all use.

Respectively,



Lisa Gibb



85 7th Place East, Suite 500, St. Paul, MN 55101-2198
main: 651.296.4026 tty: 651.296.2860 fax: 651.297.7891

www.commerce.state.mn.us

STATE OF MINNESOTA
OFFICE OF ENERGY SECURITY
ENERGY FACILITY PERMITTING
PUBLIC INFORMATION MEETING COMMENT FORM

LAKESWIND WIND POWER PLANT PROPOSED BY SOUTHWEST
LAKESWIND POWER PARTNERS, LLC
PUC Docket No. IP6603/WS-08-1449

Name: Barb Grunewald
Address: P.O. Box 226
City: Pedican Rapids State: MN ZIP: 56572

Please share your comments on the application and draft site permit to limit potential impacts, and mitigation measures to be considered in the record of this proceeding.

Turn this form in tonight or mail to the address provided on the back (use additional sheets as necessary). You may also email comments to Larry Hartman, Project Manager at: larry.hartman@state.mn.us with IP6603/WS-08-1449 in the subject line or you may submit comments on-line at <http://energyfacilities.puc.state.mn.us/>. Comments must be received no later than 4:30 p.m., Wednesday, May 20, 2008.

My Father owns 200 acres of gravel / prairie grass which is not farmable - he has always been a conservationist & truly believes wind energy is a perfect solution to the potential shortage of electric power - it is a very clean & constant source of energy and feels with the present state of the economy, this Lakes Wind project should be approved & applauded. He passed away in Dec. of 2007, but wants to look down at the turbines while we look

Signature: Barb Grunewald Date: 5-1-2009

April 29, 2009

OFFICE OF ENERGY SECURITY
ENERGY FACILITY PERMITTING
MN DEPT OF COMMERCE
85 7TH Place East, Suite 500
St. Paul MN 55101-2198

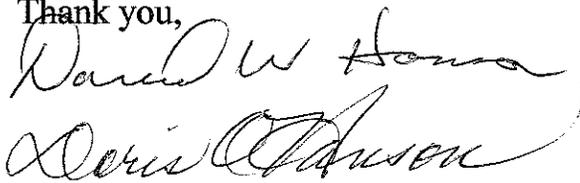
PUC Docket: IP6603/WS-08-1449 – Lakeswind Wind Power Plant

To Whom It May Concern:

We wish to go on record approving this project for Clay County. We are landowners in the project area and feel it is time to pursue alternative forms of energy for our community, state, and nation.

We feel Project Resources Corporation has presented a project worthy of our consideration and fully support them in this endeavor.

Thank you,

The image shows two handwritten signatures in black ink. The top signature is 'David W. Hanson' and the bottom signature is 'Doris O. Hanson'. Both signatures are written in a cursive, flowing style.

DAVID W. & DORIS O. HANSON
14030 Highway 32 South
Hawley MN 56549-8950

To whom it may concern,
Why wouldn't any body
want windpower?

Would they rather use
supposedly Clean Coal
to make elect?

If they don't want to see
the wind turbines then
they should stay in town
& fight the water.

Marvin Hanson

12183 Highway 32 S,



Marvin L. Hanson
12183 Highway 32 S
Hawley, MN 56549

56549

Take wind cockpit #

IP-6603/WS-08-1449

Lindley Jacobson

7713 Elm Drive, LaVista, NE 68128-2845

Phone: (402) 339-1643 Fax: (402) 593-8011

Email: silas67@cox.net

Reference: Lakeswind docket #: IP6603/WS-08-1449

If I say the word remember, what comes to mind? Something we know, right? Let me put it this way. We own land. Most of you have purchased this land with your own hard earned money. But is it really ours? Or is it a gift from God? In reality it is all a gift from God given to us to take care of and use for our own support and for the support of our neighbors.

We say that everyone should take care of themselves, right? Meets their own needs, pays their own bills and provides for themselves and their families. We say that most people in this country believe in God so what about following His laws? There is something we call the "Golden Rule", right? "Whatever you want men to do to you, do also to them." And again in numerous places it says, "love your neighbor as you love yourself." In reality we all need each other, right? We are in this together.

And so we use the land not only for taking care of ourselves and one another, but also to gain wealth. We use the land as pasture for horses, cattle and sheep, we use it to plant sugar beets, wheat and soy beans. Trucks are needed for hauling it to processing plants and elevators. People just accept the fact that the trucks are on the road. But do people like it? What about pollution?

We have also discovered that the land has many natural resources such as gravel, coal, oil and many more. Gravel is important for building roads which are not usually built next to the gravel pit. Thus trucks are necessary for hauling. People don't like it. What about pollution?

Coal is used to process steel. There is a large mine near Falkirk, ND, but there are no steel mills there. And it is used to generate electricity such as the plant near Garrison, ND. Trains deliver most of the coal to the eastern states. Sometimes these trains cut through the middle of farms such as it did on ours at Clearbrook, MN, which makes for long distance farming. We just had to work around it.

But what about the air pollution caused from coal? From the internet we learn that "burning coal is a leading cause of smog, acid rain, global warming, and air toxins. In an average year, a typical coal plant generates:

- "3,700,000 tons of carbon dioxide (CO₂), the primary human cause of global warming. As much carbon dioxide as cutting down 161 million trees.
- "10,000 tons of sulfur dioxide (SO₂), which causes acid rain that damages forests, lakes, and buildings, and forms small airborne particles that can penetrate deep into the lungs.
- "500 tons of small airborne particles, which can cause chronic bronchitis, aggravated asthma, and premature death, as well as haze obstructing visibility.
- "10,200 tons of Nitrogen oxide (NO_x), as much as would be emitted by half a million late-model cars. NO_x leads to formation of ozone (smog) which inflames the lungs, burning through lung tissue making people more susceptible to respiratory illness.
- "720 tons of carbon monoxide (CO), which cause headaches and places additional stress on people with heart disease.
- "220 tons of hydrocarbons, volatile organic compounds (VOC), which form ozone.
- "170 pounds of mercury, where just 1/70th of a teaspoon deposited on a 25 acre lake can make the fish unsafe to eat.
- "225 pounds of arsenic, which will cause cancer in one out of 100 people who drink water containing 50 parts per billion.
- "114 pounds of lead, 4 pounds of cadmium, other toxic heavy metals, and trace amounts of uranium." ([Air pollution](#)|[Union of Concerned Scientists](#), infor. dated and © 2008.)

Oil fields are lucrative. Everyone hopes for oil on their land. But the derricks, or pumpers as my oldest son called them as a child, are an inconvenience for farmers. However, they have discovered they can farm around them as they would a pile of rocks. No one complains about them, says they are an eye sore, or that they ruin the beauty of the land. Everyone likes that they bring wealth to the farmers and others who own the land.

But what about the exhaust from automobiles, trucks and trains? Even with the most advanced catalytic converters much of smog contains both Nitrogen Oxide (NOx) as well as Carbon Monoxide (CO). I am guilty as I am sure that many of you are too. You drove your car to this meeting tonight, right? And what about the oil spills that have happened in just the last 20 years? What about Prince William Sound in Alaska and the Exxon Valdez oil spill that is still costing us money? What about the spill in the San Francisco Bay in 2007? What about the spill that happened at St. George Ferry Terminal near Staten Island? Or what about the spill in Bloomberg, Australia, just north of Brisbane, that is causing 25 miles of beautiful beaches to be closed? And I could go on and list about twenty more places that spills have occurred. What happens to oil when it pollutes the water? It never sinks or disappears. And it coats and kills everything along the shore line, including birds.

Now, in this day of energy shortage and global warming, it seems that it is perfectly safe to harness the wind for wind power. There is little if any air pollution. Wind power has been available for several years in southern MN and elsewhere. Now the *Lakeswind Project* is coming to Clay County. There is an ample supply of wind and it is never used up. The blades or propellers on the turbines are relatively safe for birds and wildlife as the Site Permit Application points out. And every other possible item has been covered by this application. Wind direction and velocity plus temperature gages are used to select the most advantages places to build them.

The gravel pits, coal mines and oil fields are generally accepted. I see no reasons why wind turbines should not be added to the list. It is much cleaner and safer.

Lindley Jacobson *Muriel Jacobson*
Lindley Jacobson, Muriel Jacobson