

PUC docket IP-7002/CN-19-154 and IP-7002/WS-19-576  
Three Waters Wind Project

We attended a public information meeting on wind turbine siting held in Brewster, Minnesota in March 2019. Several people from Minnesota, Iowa, and South Dakota who live amongst existing wind power farms shared their stories of the negative effects of having a wind turbine sited on one's land or near one's residence. Their experiences suggested that wind turbine noise and shadow flicker cause significant health effects, discomfort, and reduced quality of life. It was stated that sleep deprivation is a primary complaint of those living near modern turbines. Headaches are another common complaint. Property owner after property owner made their case that the current setback distances are considerably inadequate.

Increased setback requirements would not prevent future wind farm development projects. As automation and economics have driven farm consolidation over recent decades, there are fewer and fewer farm residences on the local agricultural landscape. There are many sections of agricultural land which currently contain no farmsteads. Wind turbines could be sited in the interior of such uninhabited sections thereby providing considerably greater setback distances from existing farmstead habitations or city residences. Other sections may have only one or two aging building sites with limited future viability as a residence, for which a wind power developer could voluntarily negotiate with the property owner to buy out the farmstead thereby providing the financial means for the resident to move to another location or to retire to a nearby town. Compared to the millions of dollars required to erect a single turbine, the cost to site a turbine on an uninhabited section, or to buy out an aging farmstead, is likely to be minimal, therefore we believe that increased setback standards would not present an undue financial burden on wind power development.

One person shared a story of winter ice released from turbine blades being flung several hundred feet severely damaging the roof/side of a semi-trailer passing by on a neighboring highway. If that thrown ice had hit the truck cab, or a passenger vehicle, someone may have been killed.

Anecdotes suggest that shadow flicker can also cause significant problems. Even with shades drawn, room light levels may be significantly impacted by blade shadows passing over one's house windows. For farmers working outside, for instance repairing a piece of machinery or repairing a building, the constantly varying light levels from blade shadows passing over you at typical blade passing intervals of approximately once per second are likely to make it difficult to see the details or position of whatever tool, nail, screw, or other small item you are handling. The human iris is remarkable in its ability to adapt to different light levels, but it takes some time for it to adjust. In nature, light levels generally change more slowly, and not repeatedly second by second. Turbines should be sited so as not to cast shadows on inhabited farmsteads or other residences or worksites.

It was mentioned at the Brewster meeting that the state of Minnesota has not yet commissioned a study specifically to investigate wind turbine noise, vibration, pressure pulsation, shadow, icing, and other potential harmful effects or hazards in order to establish prudent state setback standards.

While we fully appreciate the environmental benefits of a carbon free source of electrical energy, and the economic benefits a wind turbine project may bring to the local area and the state, we urge the Public Utilities Commission and Department of Commerce to initiate a state funded and directed study to investigate the noise emissions (both in the audible and inaudible ranges as low frequency vibrations or pressure pulsations can effect human organs and the nervous system), ground-transmitted vibrations, and shadow flicker effects of large, and ever increasing in size, modern wind turbines. The state should hire independent academic and technical experts to scientifically measure and study these noise, vibration, pressure pulsation, shadow, and icing effects in order to establish appropriate setback distances from residences, worksites, roads, and property lines to protect the health, safety, well-being, and quality of life of those who live, work, or travel nearby.

Such a study should be required as part of the environmental impact study for this Three Waters Wind Project and would then also be available to safely and fairly guide this and other future wind power development projects. Furthermore, we request that the state impose such scientifically determined minimum setback distances as conditions on the design and operation of the project. We believe it would be prudent to perform such a state study now in order to ensure that future millions or billions of dollars worth of wind power development are designed and sited in a safe and effective manner and may serve the public productively for years to come.

*Lila, Mitch and Miles Voehl*  
*Lakefield, MA 06150*

*507-662-6129*

# Comment Form: Preliminary Draft Site Permit and Environmental Report Scoping

## Energy Environmental Review and Analysis

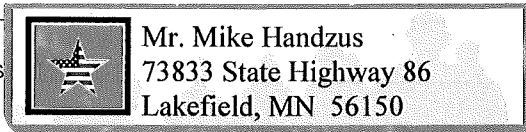
Please provide your contact information. This information and your comments will be publically available.

Name: \_\_\_\_\_ Phone: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP: \_\_\_\_\_

Email: \_\_\_\_\_



Share your comments on the proposed Three Waters Wind Farm project. Be as specific as possible.

- What potential human and environmental impacts of the proposed project should be assessed in the environmental report and addressed in the preliminary draft site permit prepared for the project?
- What are the possible methods to address (avoid, minimize, or mitigate) the potential impacts of the proposed project?
- Are there other ways to meet the stated need for the project, instead of the proposed wind farm? What system alternatives to the project should be assessed in the environmental report?
- Are there any unique characteristics of the proposed site or the project that should be considered?
- Are there any items missing or mischaracterized in the Certification of Need or Site Permit Applications?
- Are there other project related issues or concerns?

Recycling blades, this is something that need to be done no matter who is building wind farms in the state. There was at one time a company in Florida that was doing this. I don't know if they are still doing this.

TAPE HERE (PLEASE DO NOT STAPLE)

Energy Environmental Review and Analysis  
MN Department of Commerce  
85 7th Place East, Suite 280  
Saint Paul, MN 55101-2198

Affix  
Necessary  
Postage  
Here

RICHARD DAVIS  
MN DEPARTMENT OF COMMERCE  
85 7TH PLACE EAST STE 280  
SAINT PAUL MN 55101-2198

RECEIVED

FEB 26 2020

MAILROOM

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## Public Comment Period Closes Friday, February 28, 2020

Comments must be post-marked or received electronically by the comment deadline.

### *How to comment:*

- Submit this form to the Environmental Review Manager at a public meeting
- Mail this form remembering to affix appropriate postage
- Mail comments in a separate envelope to the address on this form
- Fax comments to the Environmental Review Manager: (651) 539-0109
- Email comments to the Environmental Review Manager: richard.davis@state.mn.us
- Use the online comment form at: <https://mn.gov/eera/web/project/13761/>

Comments do not need to be on this form to be accepted. We encourage you to provide comments in whatever way is most convenient for you. If commenting by email or fax use "Public Comment: Three Waters Wind Project (CN-19-154 and WS-19-576)" in the subject line.

THANK YOU for participating in the permitting process! By commenting you are helping inform the Minnesota Public Utility Commission's decision regarding this project.

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### *Comment Period: Preliminary Draft Site Permit and Environmental Report Scoping*

Three Waters Wind Farm  
Docket Nos. CN-19-154 and WS-19-576

Three Waters Wind Farm, LLC (Applicant) has filed a certificate of need application and a site permit application with the Commission for an up to 201 megawatt large wind energy conversion system (LWECS).

Please share your comments on the proposed project. Comments will be used to help to develop the scope of the environmental report and the preliminary Draft Site Permit on the potential human or environmental impacts and issues important to making an informed permit decision. Please be as detailed as possible. Use additional pages as needed. Contact the Environmental Review Manager, Richard Davis, with any questions about commenting or how to submit your comment(s).

For project information visit: <https://mn.gov/eera/web/project/13761/> or contact the Environmental Review Manager at: richard.davis@state.mn.us or (651) 539-1846.



**From:** [D. Fisher](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Public Comment: Three Waters Wind Project (CN-19-154 and WS-19-576)  
**Date:** Thursday, February 27, 2020 10:31:33 PM  
**Attachments:** [Three Waters-Public Comments-DF.pdf](#)  
[SV Township Road Flooding 2019.pdf](#)

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Rich,

Please review and submit these documents of Sioux Valley Township concerns to the commissioners.

Thank you,  
Dave Fisher  
Sioux Valley Township Chairman

Sir or Madam,

Listed below are some key concerns regarding the Three Waters Wind Project in Jackson County, Minnesota.

### **Roadway Safety**

My concern is that Scout Clean Energy is considering not using the Jackson County Zoning Ordinance (JCZO) of height of wind turbine plus one blade. This ordinance was put in place to protect the people on roads and ditches. The safety of the people is more important than what Scout Clean Energy is stating. If we don't follow the ordinances, what is the sense in having ordinances? We the people have to follow these ordinances. They are no better or different than us.

### **Cemeteries**

Another concern is that Scout Clean Energy has not addressed setbacks from cemeteries in the Three Wind Farm project area. This is very important as vibrations from turbines and construction equipment could cause damage to the stones if too close. These are all Historical Landmarks. I'm recommending a 1 mile setback from a cemetery. This needs to be addressed!!!

### **Flooding Issues**

Sioux Valley Township has many rivers and streams flowing throughout the area and lead to extensive flooding during times of high waters during the year. Maps and images of flooding and/or damages to Sioux Valley roadways included after this page.

### **Wildlife Protection**

The setbacks on the wildlife avoidance map are not the same all the way around the boundary. Setbacks should be at least ½ mile from wildlife area on the avoidance map. Sioux Valley has 10 protected waters & 14 shoreland natural environment waters. With all the flooding we have, the setbacks from the protected waters needs to be out farther, too. Sioux Valley is a wildlife habitat and has swamp area for nesting also. Many different kinds of wildlife follow the 10 protected waters that pass through the township, with some going into or nearby Skunk Lake and/or wetlands in the avoidance area and other areas close by. There are also, Trumpet Swans on Skunk Lake that fly back and forth to Illinois Lake.

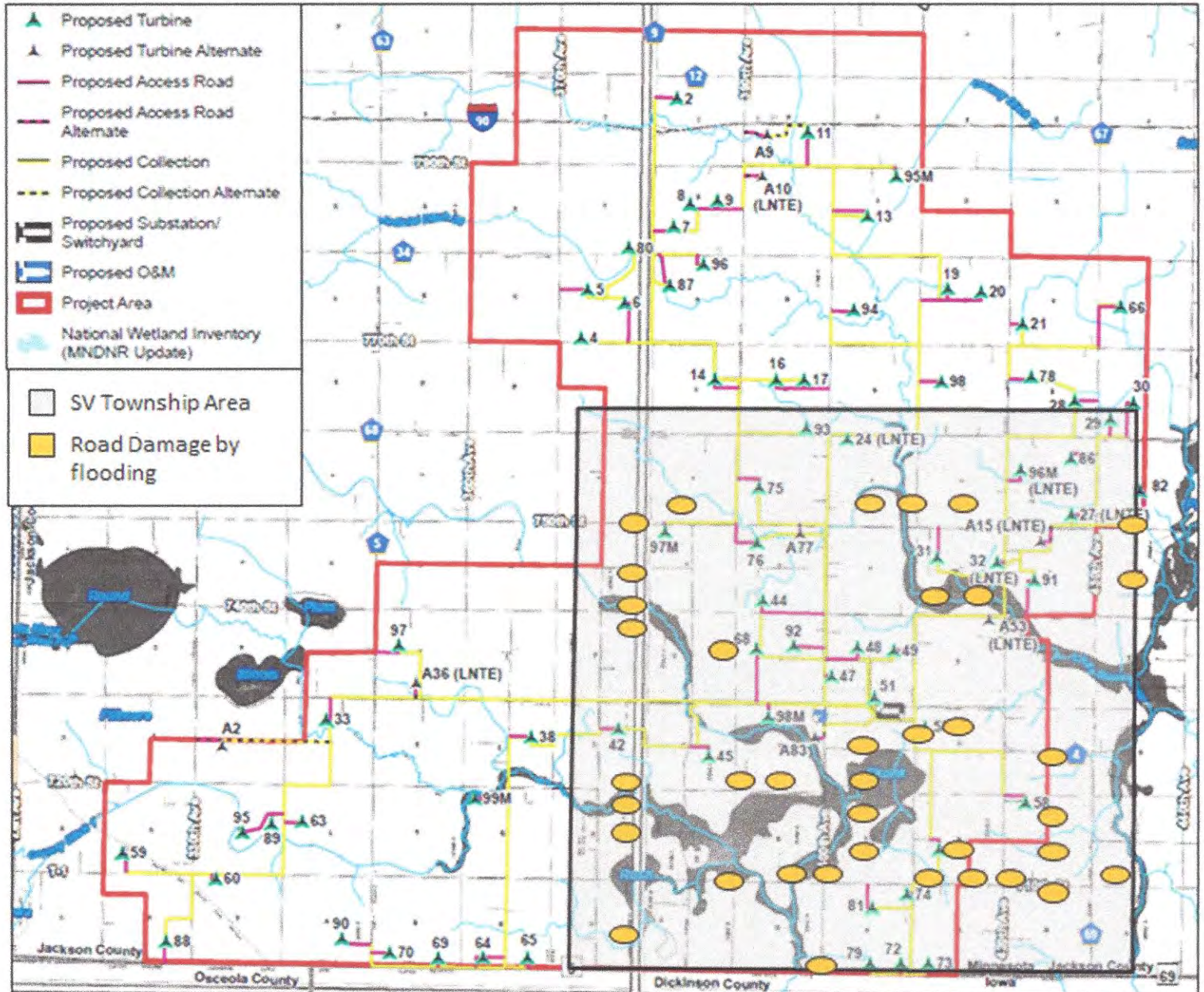
### **Misleading Information**

Scout Wind Energy was not truthful at the Public Information meeting on February 20, 2020. Scout Clean Energy was questioned on the accuracy of their maps. Scout Clean Energy has turbines on land not signed up. It was mentioned at the meeting by some landowners that their land is classified as "Agreement under negotiation" and they were a definite "no" and never had been negotiating with Scout Clean Energy. How can Scout Clean Energy get approved for a project when they constantly mislead people to make their project be viable?

Sincerely,  
David Fisher  
Sioux Valley Township Chairman

# Three Waters Wind Project

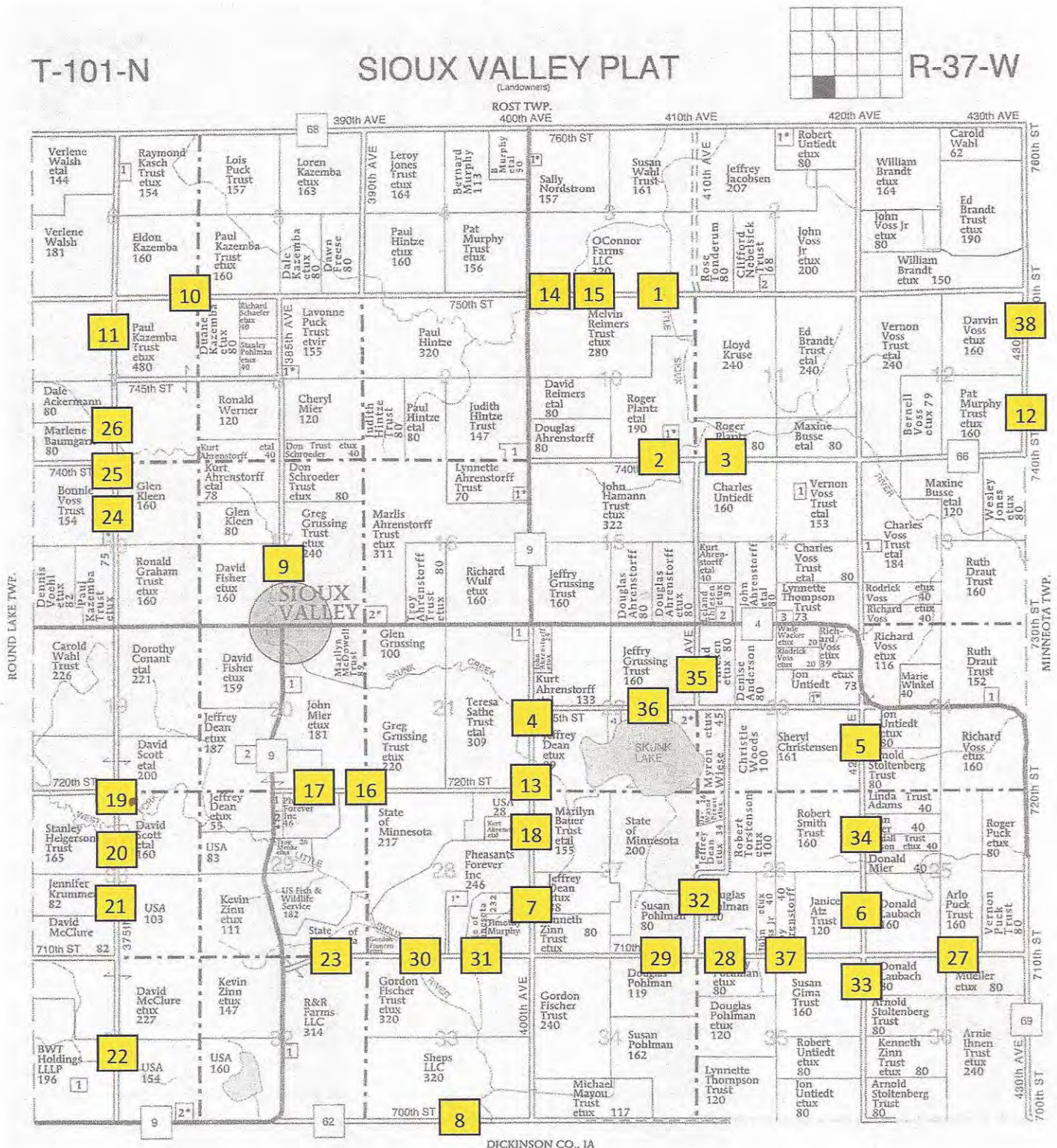
## Sioux Valley Township Road Flood Damage 2019





## 2019 Spring Flooding Road Damages

R-37-W





# Sioux Valley Township



Area 01    750th St    43.573092   -95.257540



Area 01    750th St    43.573092   -95.257540



Area 01    750th St    43.573092   -95.257540



Area 02    740th St    43.558618   -95.252645



Area 03    740th St    43.55863   -95.249446



Area 04    400th Ave    43.531953   -95.274721



# Sioux Valley Township



Area 04 400th Ave 43.531953 -95.274721



Area 04 400th Ave 43.531953 -95.274721



Area 04 400th Ave 43.531953 -95.274721



Area 05 42X Ave 43.53637 -95.234900



Area 06 42X Ave 43.51706 -95.23461900



Area 07 400th Ave 43.517147 -95.274668



# Sioux Valley Township



Area 08 700th St 43.500515 -95.285525



Area 09 385th Ave 43.548971 -95.304848



Area 10 750th St 43.573015 -95.312448



Area 11 375th Ave 43.569454 -95.325022



Area 12 430th Ave 43.570798 -95.21514



Area 12 430th Ave 43.570798 -95.21514



# Sioux Valley Township



Area 13 400th Ave 43.532873 -95.274723



Area 14 750th St 43.573104 -95.271485



Area 14 750th St 43.573104 -95.271485A



Area 15 750th St 43.573099 -95.273348



Area 15 750th St 43.573099 -95.273348



# Sioux Valley Township



Area 16 720th St 43.529522 -95.288551



Area 16 720th St 43.529522 -95.288551



Area 17 720th St 43.529526 -95.288751



Area 18 400th Ave 43.528493 -95.274739



Area 18 400th Ave 43.528493 -95.274739



Area 19 375th Ave 43.527353 -95.324607



# Sioux Valley Township



Area 20 375th Ave 43.522784 -95.324681



Area 21 375th Ave 43.521382 -95.324709



Area 22 375th Ave 43.506612 -95.324663



Area 23 710th St 43.51506 -95.297213



Area 23 710th St 43.51506 -95.297213



Area 24 375th Ave 43.556154 -95.324849



# Sioux Valley Township



Area 25 375th Ave 43.558427 -95.324918



Area 26 375th Ave 43.558608 -95.324820



Area 26 375th Ave 43.558608 -95.324820



Area 26 375th Ave 43.558804 -95.324883



Area 27 710th St 43.515279 -95.219902



Area 28 710th St 43.515092 -95.253163



# Sioux Valley Township



Area 29 710th St 43.515054 -95.260759



Area 29 710th St 43.515054 -95.260759



Area 30 710th St 43.515051 -95.281506



Area 31 710th St 43.51504 -95.280949



Area 31 710th St 43.51504 -95.280949



Area 32 410th Ave 43.520338 -95.254682



# Sioux Valley Township



Area 33 42X Ave 43.515058 -95.234637



Area 34 42X Ave 43.515509 -95.234649



Area 35 410 Ave 43.541669 -95.254811



Area 36 725th St 43.536724 -95.260559

**From:** [D. Fisher](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Public Comment: Three Waters Wind Project (CN-19-154 and WS-19-576)  
**Date:** Thursday, February 27, 2020 10:15:20 PM  
**Attachments:** [wind turbine pre-permit letters.pdf](#)

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Please submit my attached file to the commissioners.

February 27, 2020

Sir or Madam,

I'm writing this after attending the February 20, 2020 public meeting. (The projector had projected the left side, off the screen, so no one could not see or read the complete presentation on screen. And they had run out of the individual paper booklet copies.) Once again, I had just a few actual answers to many very important questions or comments. I, and others, would like to know the actual true facts and see accurate true figures and maps. Some of the informational studies that Scout Clean Energy had presented were not even true or accurate; as some were mentioned at the public meeting that night. **How can anyone make a decision on granting a permit when you don't have the actual true facts and figures for information and /or have misleading information, on the project?**

When exiting the public meeting, a nature environmentalist (Westwood) that did work for Scout Clean Energy walked over to a couple of us and mentioned in his conversation that it was okay to "slaughter the bats" & "kill a few eagles". I, being a farmer living in the project area, need bats, and we do have some large bat colonies in our project area. A lot of bat colonies have been affected by the White-Nose Syndrome (WNS), & have destroyed many of the bat population. The wind turbines also affect the bats that fly within their wind buffer, as their lungs erupt or explode from the air force. Those bats fly many miles every evening across our land. They seed & reseed for us, especially in needed areas we physically aren't able to get to. They help with our pollination & they eat an overabundance amount of insects that can destroy our crops. Because of those bats, we are able to use lesser pesticides on our land, which in turn affects our fields & streams. We have **10 protected waters** and **14 shoreland natural environment waters** in Sioux Valley Township alone, that need to be protected, and if we end up with fewer bats, we'll have to use more pesticides. So then, what happens to those waters?

It was also mentioned to us, at that same time when we were exiting the public meeting and talking to the nature environmentalist (Westwood), that the Rusty Patch Bumble Bee is endangered but there aren't any of those in the project area; well, I personally have seen them in our pastures & grasslands along Skunk Creek. So, I question that study also. (The protected boundary area is **not** protecting all of our protected waters that are in the project area.)

Also, those waters should be protected from infrasound from wind turbines being constructed & when operating, as the ecosystem is a very important factor for our futures. Studies show that our ecosystem may be in serious danger by 2050 if not protected.

The **FAA Rules & Regulations guidelines should be enforced**, as we have areas that only a plane is capable of doing the job. Planes are needed to spray certain areas because of the lay of land, the precipitation amounts received, the height limitations, the entanglement, maturity of the crops, or the small time frame to have the job done in. Wind turbine placements & sizes are very important to a pilot. **Turbines can cause a circular vortex that can roll a plane and increase crosswind speeds posing a danger to aircraft.** A nonparticipating landowner should not have to wonder if a plane or pilot is not safe or able to do the job adequately because of enormous wind turbine(s).

We rely on GPS systems for farming also, and when switching between satellites; it takes some time to connect to another satellite & the accuracy is usually always off.

Losing signals when planting or spraying, could cost the farmer immensely.

Wireless Internet Service Providers (WISP) is a "lifeline" in our area. We use it for our computers, printers & our "so called land line" Magic Jack, which may be used for Medic alert & for a "home phone" if children would be home alone. (Some Providers are not available in our area & others are too expensive for some residents.)

Tv Antenna (air) Most are pointed towards Jackson MN, Sioux Falls SD, or Sioux City IA towers to receive television local news & public channels stations.

Tv dishes (Satellite) Shouldn't all non-signed residents be contacted to make sure there would be no wind turbines blocking or interfering with their receiver's signals.

In fact, shouldn't all of these telecommunications be confirmed with each & every residence **before** a permit is granted and **before** a wind turbine is constructed.

Shouldn't all electric lines & cables be the same distance as a wind turbine from any nonparticipating landowner's boundary; as some landowners share boundaries that have tile, tile outlets, tile inlets, trees (if tree roots need to be extracted) or surfacing boulder rock that may need to be excavated.

Also, some nonparticipating landowners have tile that hooks onto or goes through a participating landowners land (downward); if there are any problems with the drainage (upland) and crop damage or losses (whether planted or not planted, or not harvested), or soil damage occurs (or unable to do their tillage). Who pays for the crop loss or damages? Is a nonparticipating landowner guaranteed compensated (either by the wind turbine company or the state of Minnesota) and within a certain time frame (90 days) and without any expenses to the nonparticipating landowner?

The **Sioux Valley Township Cemetery** was not mentioned or marked out on any of Scout Clean Energy documents or maps that they presented to the Minnesota PUC for their permit. In fact, there were no cemeteries mentioned or marked in or near the project area. I, and others, feel this is our oldest and most sacred historical landmarks we have; besides early settlers, there are Civil War Veterans buried within. We have some very old and fragile gravestones that need to be protected from any vibrations, including when wind turbine parts and machines and/or equipment are being transferred by the cemetery, and when the wind turbines are being constructed and operating. Some of those gravestones are very expensive and some are irreplaceable, so there should be a very strict setback from all cemeteries, as vibrations over time could do damage to tiered gravestones, also. I feel at least a one mile setback would hopefully be adequate at this time, for this project.

The **safety of the people**, whether participating or nonparticipating, should be the first and foremost importance of this project. I feel that with this project having such huge wind turbines involved, the setbacks should be set accordingly for their structure & largest (possibly future) blade size, their noise, any ice throwing or falling problems, or mechanical problems. And any and all setbacks should be enforced and with no exceptions. The setbacks on all road right-of-ways should be height of the structure plus one blade, to protect all the people; whether a vehicle, motorcycle, bicycle, atv, utv or snowmobile. (Some of those transportations are not "bodily" covered from elements.) We are the people that live here and travel these roads the most (and/or ditches), so **shouldn't are safety be first**. The County & Townships should be the ones dictating and enforcing those setbacks, not Scout Clean Energy!

**Why do we have rules, regulations, or ordinances; if they're not made to be followed?**

(I have to follow all the rules & regulations!)

**Whose job is it to protect us?**

There seems to be a lot of inaccurate and/or unthorough information in the permit request documents that Scout Clean Energy submitted. So how is it possible to make a decision to grant a permit on that information?

American Agricultural Farmer that resides in Sioux Valley Township,

Diane Fisher



**From:** [Haylee Behrends](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Docket Nos. CN-19-154 and WS-19-576  
**Date:** Thursday, February 27, 2020 5:48:58 PM

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To: Richard Davis regarding Three Waters Wind Farm, LLC.  
Docket Nos. CN-19-154 and WS-19-576

The wind turbines change the landscape of this agricultural community. Most people who live here enjoy living in an agricultural community and these wind projects are turning an agricultural community into an industrial one. The big sky and big horizons that we get to enjoy as a result of the very flat lands here become tainted by towering wind turbines. The general aesthetic of wind turbines is awful, and it rarely looks as serene as it is depicted in advertisements.

They disturb animals, I witness this often when my dogs bark at sudden noises or shadow flicker from the turbines that travels into the house. The shadow flicker disrupts sleep and disturbs a person during the day while trying to get work done. This is annoying and aggravating.

My biggest concern is what will happen to the towers once this energy becomes obsolete or the company goes defunct? Rushing to put up wind farms merely for the sake of making extra money seems way too hasty and irrational. There is no real reason why the United States or this area needs to rush into switching to wind energy.

More research should be done on the effects they have on wetlands, setbacks are not far enough back, the noise levels are too high, and there is no guarantee that they will be properly removed when the time comes, or that they can be recycled.

Sincerely,  
Haylee Behrends

**From:** [Michael Fisher](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Public Comment: Three Waters Wind Project (CN-19-154 and WS-19-576)  
**Date:** Thursday, February 27, 2020 10:49:29 PM  
**Attachments:** [Three Waters-Public Comment-MF.pdf](#)

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Rich,

Please review these two maps in the attached file that indicate inaccuracy of data and forward to the commissioners.

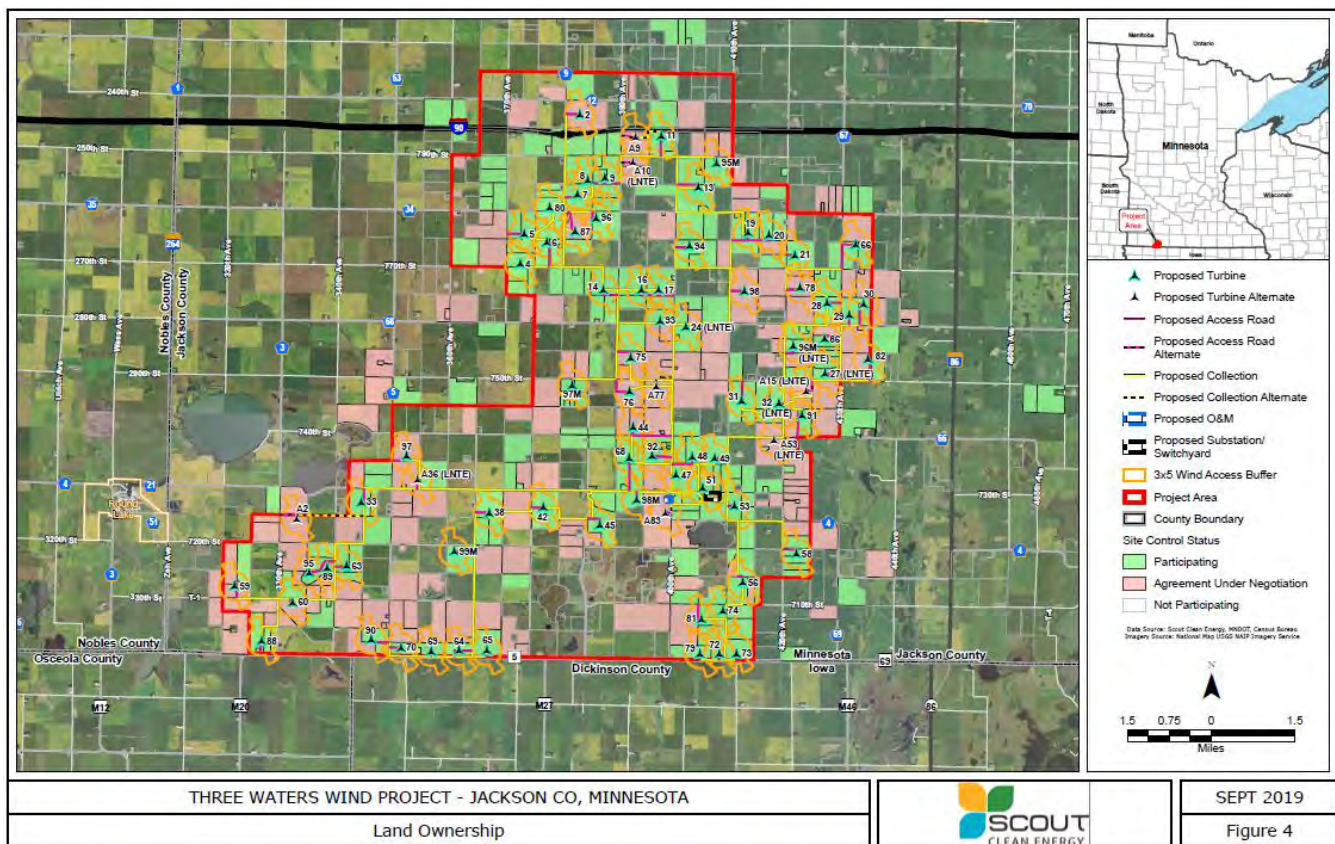
Thank you,  
Mike Fisher

## How can one designate a wind turbine on land that has no land or wind access agreements?

**72%** of wind turbines don't have land agreements met or wind buffer access.

- 19 Turbines on land with no agreements signed
- 38 Turbines with land agreements but don't meet the 3x5 wind access buffer
- 19 Turbines meet 3x5 wind access buffer
- 3 Turbines are questionable as map doesn't indicate if Iowa wind access buffer obtained

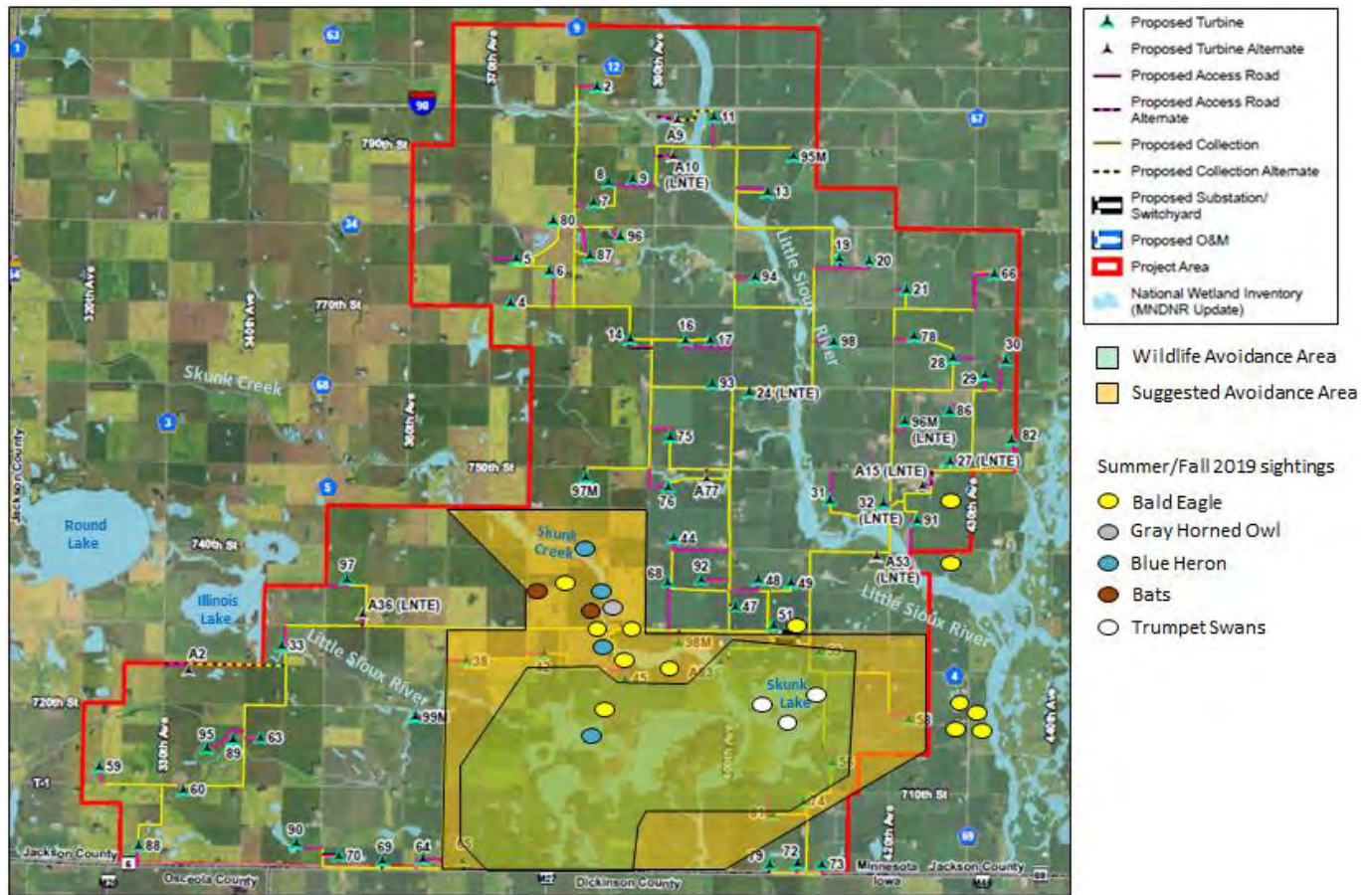
Based on "Figure 4" included below and submitted by Scout Clean Energy to the MN PUC for site permitting.



## Wildlife follows the lay of the land and does not recognize land ownership.

- Wildlife travels along lakes, streams and grasslands.

Wildlife sightings outside of the wildlife avoidance area during summer – fall of 2019



As you can see on the map above wildlife travels outside of the avoidance area on a regular basis. Sioux Valley Township has lots of grasslands, streams, rivers, ponds, and lake. A lot of government money has already been spent developing areas of Sioux Valley Township into wildlife habitats.

At this innovative time while making bold decisions, one should be social responsible to the effects on human beings and the environment within and adjacent to the Three Waters Wind Farm project.



**From:** [Paul Hintze](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Re: three waters wind  
**Date:** Tuesday, February 25, 2020 9:23:33 PM  
**Attachments:** [image003.png](#)

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hey,

The guy who develop the site has passed away. His name was Byron Christoffer. His daughter Dana and son-in-law Kevin Schmid have lived on that sight for many years. He is the guy to talk with. I called Kevin today and asked if he would be willing to talk to you and agreed to do so. His number 507 360 2851. The turbine is located in section 20 Ewington Township, Jackson County. He also mentioned he has witnessed ice coming off the high line wires that run along I90, and hitting the road, if that is of interest to you.

I looked up the turbine on the U.S. Wind Turbine Database. It is listed as follows

Turbine ID 3017771

Project Name Ewington

Year 2008

Rated Capacity 2.1 MW

Hub Height 89 M

Rotor Diameter 88M

Total Height 123.10

Manufacture Suzlon

Model S88

I have heard that a similar ice throw has happened at another local farm, but I can't pin point where and who. Kevin's place is on a main road ( Jackson county 34) that I travel often and you can see the shed from the road.

Thanks for the interest, and if you have any more questions let men know.

paul

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**From:** Davis, Richard (COMM) <richard.davis@state.mn.us>  
**Sent:** Tuesday, February 25, 2020 8:38 AM  
**To:** Paul Hintze <paulfarms@msn.com>  
**Subject:** RE: three waters wind

Good Morning Paul,

Thank you for resubmitted your second set off comments.

Is there any chance you would be willing to give me the name and phone number for the landowner

you referred to in your comments on ice throw? I would like to talk with him, and get some more details regarding weather conditions he may have noticed during ice throw events and possibly more information about the turbine out there if possible.

Thank you much,  
Rich

Richard Davis

Environmental Review Manager

Energy Environmental Review and Analysis

Office: 651-539-1846

Cell : 507-380-6859

[mn.gov/commerce](http://mn.gov/commerce)

Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101



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**From:** Paul Hintze <paulfarms@msn.com>  
**Sent:** Monday, February 24, 2020 11:31 PM  
**To:** Davis, Richard (COMM) <richard.davis@state.mn.us>  
**Subject:** three waters wind

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Richard Davis Department of Commerce Environmental Review

This comment is relating to the set back requirements for Roads and Recreational Trails

Reviewing docket number 251911-157465-01.

Three Waters response to EERA staff comments in regards to setbacks for Roads and Recreational Trails is Totally lacking credibility. They claim there is not adequate justification for requiring a setback of more than 250 feet. Three Waters claims 250 feet is adequate to

protect public roads from ice throw. I have some justification, proof and rational that it is not. The JCZO setback is more restrictive, but that doesn't make it wrong for the project. Maybe the people living where the turbines are being proposed have reasons why they want the turbines set back from public roads. The example I am providing is of a individual that has involvement with a turbine and its placement by his own shed. The example is a real life situation involving distance and ice throw. The attachment shows a picture of a turbine and a machine shed with a maroon roof. They are approximately 330 feet apart. The roof of the machine shed is full of dents and has had several sizable holes put threw the roof over the years from ice throw. This turbine is right here in Jackson County only a few miles west of Three waters proposed project area. Come drive by it, the dents and holes are visible from the road. If that turbine was placed at 250 feet from the road, that ice would be hitting the road, passing cars or school buses. My kids ride the bus to school. We drive these roads every day. Safety is the reason to require adequate set backs. 250 feet is not adequate. These towers are 499 feet tall, that alone should keep them 500 feet from the road way for possible tip over, or malfunction. Three waters should be well versed in what ice can do around here. There own met tower located in the proposed project area, here in Jackson County collapsed from a ice storm in April of 2019. For them to plan a project and claim hardship over a set back that they were well aware of is absurd. Find other locations or make use of your built in alternate sites. Three Waters should follow the set back rule of the JCZO. Three Waters should not get a pass on setbacks; doing so is a pass on safety. They should want to plan a safe project, but I guess they wont be living here.

Sincerely,  
Paul Hintze  
74075 400th Ave  
Lakefield MN 56150

**From:** [Paul Hintze](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Three Waters Wind  
**Date:** Sunday, February 23, 2020 10:13:37 PM

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Richard Davis  
Depart of Commerce Environment Review

The focus of this comment is for alternatives to the project.

The Bakken oil fields in neighboring North Dakota are burning off a lot of natural gas as a result of oil drilling. Apparently there is more natural gas than they know what to do with. Seems to me to be a big waste of energy to be just burning off a resource in order to produce oil. We are probably not at the period in history where we can get by without the oil. We should utilize the natural gas that is being wasted to produce electricity. The wind project produces mostly clean energy once up, but it takes a lot of carbon energy to create, complete and maintain an industrial wind project. The natural gas is already being burned to produce nothing, it should be utilized. Air pollution knows no boundaries, we should at least offset it with useable electricity.

Another avenue worth exploring related to wind energy and solar vs natural gas or coal produced electricity is the reliability of supply. Wind is probably the least reliable of them all. Solar can at least be predictable to the point of daylight hours. The wind simply doesn't blow some days. Half the time there is no electricity being generated from an industrial wind project. People and businesses don't stop or reduce their electricity needs because the wind isn't blowing, quite the contrary, I would suspect that the highest energy demand days come on hot summer days when there isn't a breeze and every fan and air conditioner in the state is running. The State should be focused on projects that ensure stable and reliable sources of power. We have enough unreliable wind power. I worry for the day when we have focused too much on so-called renewable sources and let reliable sources fall by the wayside. Until someone figures out a way to effectively and efficiently store electricity for periods when the wind isn't blowing, we should focus on reliable. Wind simply isn't reliable today.

How many dollars are being poured into the infrastructure for the development of wind. It seems to be a duplication of existing resources for power distribution. What happens to wind projects if the federal tax credits go away? Do they remain operational?

Sincerely,



Paul Hintze  
74075 400th Ave  
Lakefield MN 56150

**From:** [Paul Hintze](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** three waters wind  
**Date:** Monday, February 24, 2020 11:32:43 PM  
**Attachments:** [Wind Turbine Distance \(1\).pdf](#)

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Richard Davis Department of Commerce Environmental Review

This comment is relating to the set back requirements for Roads and Recreational Trails

Reviewing docket number 251911-157465-01.

Three Waters response to EERA staff comments in regards to setbacks for Roads and Recreational Trails is Totally lacking credibility. They claim there is not adequate justification for requiring a setback of more than 250 feet. Three Waters claims 250 feet is adequate to protect public roads from ice throw. I have some justification, proof and rational that it is not. The JCZO setback is more restrictive, but that doesn't make it wrong for the project. Maybe the people living where the turbines are being proposed have reasons why they want the turbines set back from public roads. The example I am providing is of a individual that has involvement with a turbine and its placement by his own shed. The example is a real life situation involving distance and ice throw. The attachment shows a picture of a turbine and a machine shed with a maroon roof. They are approximately 330 feet apart. The roof of the machine shed is full of dents and has had several sizable holes put threw the roof over the years from ice throw. This turbine is right here in Jackson County only a few miles west of Three waters proposed project area. Come drive by it, the dents and holes are visible from the road. If that turbine was placed at 250 feet from the road, that ice would be hitting the road, passing cars or school buses. My kids ride the bus to school. We drive these roads every day. Safety is the reason to require adequate set backs. 250 feet is not adequate. These towers are 499 feet tall, that alone should keep them 500 feet from the road way for possible tip over, or malfunction. Three waters should be well versed in what ice can do around here. There own met tower located in the proposed project area, here in Jackson County collapsed from a ice storm in April of 2019. For them to plan a project and claim hardship over a set back that they were well aware of is absurd. Find other locations or make use of your built in alternate sites. Three Waters should follow the set back rule of the JCZO. Three Waters should not get a pass on setbacks; doing so is a pass on safety. They should want to plan a safe project, but I guess they wont be living here.

Sincerely,

Paul Hintze  
74075 400th Ave  
Lakefield MN 56150



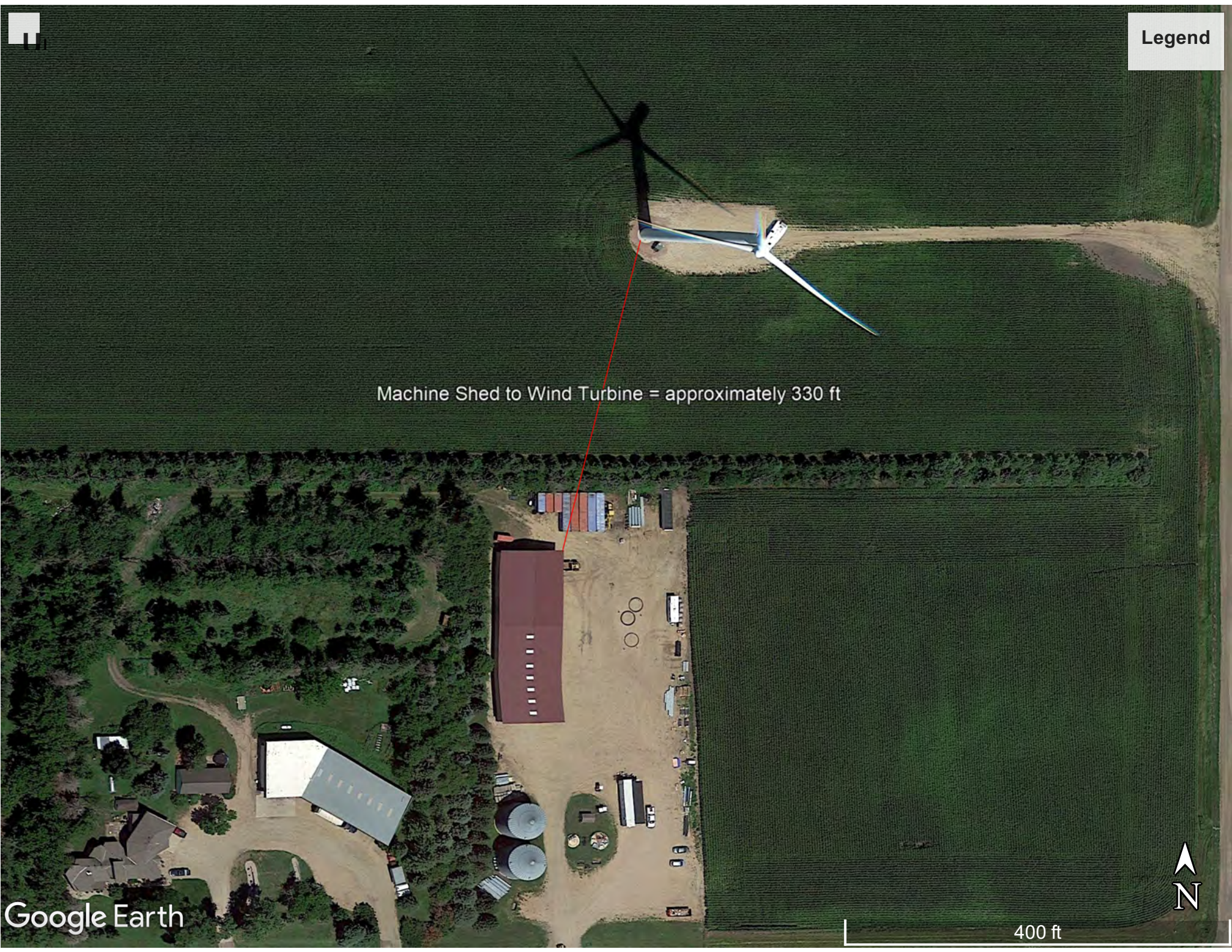
Legend

Machine Shed to Wind Turbine = approximately 330 ft

Google Earth

400 ft

N





**From:** [Paul Hintze](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Three Waters  
**Date:** Tuesday, February 25, 2020 9:54:41 PM

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Richard Davis Department of Commerce Environmental Review

The DNR submitted a letter dated 5/11/17 outlining a Area of Avoidance pertaining to the Three Waters Wind project. The DNR provided good reasoning as to why that area should be left as is, and not to be disturbed by a Wind Project. That area is located in the heart of Sioux Valley. What I didn't see mentioned was the fact that it has taken many years to acquire the wild life areas. It is a culmination of different projects, by different entities, DNR, US Fish & Wildlife and private persons and groups, all working hard to create a outdoor wildlife experience. The area supports a wonderful habitat for wildlife. Also not mentioned is the area provides habitat for migrating ducks and geese. It is quite a site to observe the thousands of ducks and geese in the spring that stop for a evening to rest. This probably has been going on for hundreds of years, at least for the last hundred as my grand parents had, and now I have witnessed. Sioux Valley is rich in habitat for a bird. It would disappointing if this migration of snow and blue geese were to change because of a wind project. There are many areas available for wind projects to be built, many less sensitive than Sioux Valley. You only have to travel a few miles east or west and you will not witness this migration phenomenon.

It should also be mentioned that there is a Eagle population in the area, I don't know how many, all I can say is that there were never any Eagles around he when I grew up, it is very cool to see them now. I would hate to see them chased out of here by wind turbines.

Another really cool feature not mentioned by the DNR, located just out side the project boundary is a heron rookery. I believe them to be fairly rare around here. It is located along minnesota highway 86. The DNR does not get a good grade on that subject. They were apparently unaware of its existance and were in the process ofcutting the trees down. Luckily a local, obsevered what was about to take place and intervened. The tree cutting project was halted and the majority of the heron rookery saved.

I hope all these wildlife features are considered when desiding on whether to grant a permit and what stipulations if granted should be in place.

sincerely,  
Paul Hintze  
74075 400th Ave

Lakefield MN 56150

**From:** [Paul Hintze](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Three Waters Wind  
**Date:** Thursday, February 27, 2020 9:31:53 PM

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Richard Davis Department of Commerce Environmental Review

NO ROOM ON THE GRID, that is the headline on the front page of the Worthington newspaper, The Globe on Saturday February 22, 2020. Worthington is in Nobles County; Neighboring County of Jackson. To sum up the article, Nobles County is out of Transmission line capacity. After Nobles 2 Wind comes online, there wont be any other projects coming to Nobles County unless transmission capacity is increased. Not sure if that is true, or a justification to press for more transmission capacity. Is there adequate grid/transmission space for the proposed Three Water Project? I am not sure how it all works with the wind available sometimes, and other days not. Should a full grid be a concern? Is a full grid a good thing or would that be a concern. I think we have plenty of transmission lines in this part of the state for the number of people and businesses around here.

sincerely,

Paul Hintze  
74075 400th Ave  
Lakefield MN 56150

**From:** [Paul Hintze](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Three Waters Wind  
**Date:** Friday, February 28, 2020 12:18:15 AM

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Richard Davis Department of Commerce Environmental Review

This comment is in regard to noise and noise modeling. Three Waters conducted local noise monitoring as part of the permit process. They monitored noise in late June and Early July for about a week in total. I question why that time period is used and why not more periods spread throughout the year. We have very different weather around here. Temperatures vary considerably as do the moisture levels in the air. I would think that to get the most accurate portrayal for base line sound that at the very least there should be 3 to 4 samples recorded, recordings spread throughout the year. I contend that the baseline noise level would be lower than recorded. With a lower baseline, the spread between baseline and 47 dBA that Three Waters is projecting from there Noise modeling; would produce a seemingly much wider gap between baseline noise and turbine noise, which in turn makes the turbine "sound" louder.

There appears to be a argument that if the turbine is grinding away at 47 dBA and the background (baseline) noise is high enough that there is less distinction of noise difference. I would agree to a point, but where I disagree is when the theory of noise A measures 35dBA and noise B measures 47 dBA, that the total sum only equals 47 dBA. Just because the blender in the room measures the loudest by itself, the TV and dishwasher and fan are all still contributing to overall noise bombardment.

Three Waters Wind Conducted there baseline monitoring at several sites with in and around the project boundary. They monitored baseline sound at 1.5 meters above the ground, ok fine. Why in there modeling are they not using the same height? Why 4 meters above the ground, when you chose 1.5 for baseline testing. Inconsistent. Then there modeling is based on 50 degree and 70 percent humidity; do they not throw different temperatures and humidity into the modeling to see what happens? It is not going to be that specific temperature and humidity for long, this in Minnesota, if you don't like the weather hang around for a few hours, it will change. What is the point of modeling if don't factor more than just one set of parameters? Then to complicate the matter even more, they decide to use a ground factor of .7 instead of .5. What about winter time and frozen ground with no cover? That might factor zero, we have plenty of winter, seems maybe the longest season. I question why you would conduct any type of modeling or testing not using the guidelines of the State, only to be followed by a conservative factor adjustment that Three Waters gives themselves for using the wrong type of model to begin with. Why cant any thing I read about this noise



testing and modeling be consistent. My guess is they want introduce 4 meters as a choice for post-construction testing so they can pass, and then claim consistency, which there is none. Most peoples ears are at 1.5 meters and below, that is where any test should be done, not 4 meters up in the air. They also appear to have incorporated low noise blades and various "noise reduced operations", which of course are top secret and unproven. I don't even know what the rated noise level is for the turbine assuming a 89M tower. How are multiple turbines located in close proximity sound tested?

What is the proto call for post construction noise disputes? What type of equipment is used? I noticed that the turbine closest to me is already incorporating the LNTE and NRO and is projecting a 47 dBA level.

sincerely,  
Paul Hintze  
74075 400th Ave  
Lakefield MN 56150

**From:** [Paul Hintze](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Three Waters Wind  
**Date:** Friday, February 28, 2020 8:15:49 AM

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Richard Davis Department of Commerce Environmental Review

Subject Tile Drainage

I would like the proposed response from Three Waters Wind and Scout as to what, if anything, is going to be done for non participating land owners in regard to tile damage and crop loss. Tile, referring to a pipe buried below the surface to remove excess water. Tile lines typically connect low lying areas and eventually empty into a open drainage ditch. Gravity along with sloped grade allows the water to flow down hill. Participating landowners have a contract that states Scout/ Three Waters will repair the damage I think, not sure if they reimburse for lost crops due to flooding, they should. What about the guy who is not part of the project, has no contract with Scout or Three Waters, and experiences crop loss due as a result of damaged tile on neighboring property. Assume for discussion that neighbor is participating and has a contract. The neighbor will get the tile fixed and be compensated for crop damage, if any exists. Is Scout / Three Waters going to reimburse a non participating landowner for his crop loss, due to a damaged tile in the neighbors field? And until the problem is rectified, which I hear from other projects that have happened around this area can take years. What remedy exists for the non participating land owner? This is going to be a wide spread problem in this area. There is a lot of tile in this area. I can think of five situations off the top of my head where I would be exposed to this potential problem. Tile lines run across property lines all the time. Sometime the same line crosses back and forth several times before it reaches its outlet.

Some tile systems around here are over 100 years old. They might not even need a crane driven directly over top of them to cause damage. The vibration alone, could be enough to cause the damage. Then of course there are the collection lines that will undoubtedly cut thru tile lines. I read somewhere they purpose to install collection line at 42" inches. I would venture to say the majority of tile around here is buried between 36" to 48" below the surface. I think the lines should be installed below 6 feet. How are you going to properly repair a line and maintain grade for proper flow if you are installing collection lines at the exact depth of tile systems in the area. Not to mention at that depth there is the potential for problems down the road from erosion. We are presently having to deal with a natural gas line buried in one of the fields we farm. Time has allowed the pipeline depth to become very shallow, shallow enough that we cant safely do deep tillage over top of it any longer. A

neighbor down the road apparently hooked it and brought the situation to our attention. Hooking a high voltage line would not be good for anyone, farmer, landowner or Wind Company.

I think a plan needs to be in place to address these potential issues. I hope there is one other than having to sue your neighbor for something he directly didn't do.

sincerely,

Paul Hintze  
74075 400th Ave  
Lakefield MN 56150

**From:** [Jessica Welu](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Cc:** [Jason Walker](#)  
**Subject:** SRDC comments on PUC Docket #19-154 and 19-576 Three Waters Wind. If questions, please contact Jason Walker at our office. Thanks, SRDC  
**Date:** Friday, February 14, 2020 2:28:15 PM

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## **Southwest Regional Development Commission Project Review**

**Agenda Item:** 6

**Meeting Date:** February 13, 2020

**Project Name:** Three Waters Wind Farm, LLC Site Permit Application; Minnesota Public Utilities Commission DOCKET NO. IP-7002/WS-19-576

### **Project Description**

In July and September, 2019, Three Waters Wind, LLC (Applicant or Three Waters) submitted applications to the Commission to construct and operate a LWECS in Jackson County. In order to construct the Three Waters Wind Project (Project), the applicant must be granted a certificate of need and a site permit from the Commission. The proposed project would entail construction of 71 wind turbines for a combined nameplate capacity of 201 MW. The project also includes a 300 foot 345 kV high voltage transmission line, a collector substation, transformers, collection lines, an operation and maintenance (O&M) building, permanent meteorological tower(s), gravel access roads to each turbine, temporary construction areas, including crane paths, pull sites, access roads, a batch plant, and a laydown yard. The project footprint would occupy approximately 48,087 acres of land southwest of the city of Lakefield, along the Minnesota-Iowa border. The Applicant has also secured 11,000 acres of additional land in Iowa to site turbines, if some of the proposed Minnesota turbine locations are found unfeasible. The project would interconnect with ITC's electric transmission grid. The Applicant asserts that the Project is intended to assist Minnesota Municipal Power Agency (MMPA) achieve its internal goal of generating 100 percent of its energy needs from renewable sources.

### **Staff Comments**

- Project representatives have reached out to County Commissioners on October 16, 2018 and on March 19, 2019 with updates about development work, design/engineering, field surveys, permitting, land acquisition and overall Project timeline. Don Wachal, a Jackson County Commissioner who also serves as a Commissioner for the SRDC, approved of the project and had no concerns when staff reached out to him on February 5, 2020.
- Turbines will be lit in accordance with FAA requirements with appropriate light mitigating technology, i.e., ADLS (with wind turbine visibility lights remaining off approximately 98 percent of the time, light pollution will be minimized, and further mitigation will not be necessary);

- Project will pay a Wind Energy Production Tax to the local units of government of \$0.0012 per kWh of electricity produced, resulting in an annual Wind Energy Production Tax of approximately \$1 million; over the life of the Project, Jackson County and the affected Townships will benefit from approximately \$35.1 million in direct economic benefit.

**Project Review Time:** 2 hours

**Income to the SRDC for this Review:** \$0

**Reviewer:** Jason Walker, Development/Energy Planner

**From:** [susan untiedt](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** Three Water Wind project  
**Date:** Friday, February 21, 2020 7:04:05 PM

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Mr. Davis,

My name is Susan Untiedt. I live in Sioux Valley township, Jackson County, MN. I ride horses several miles every day the weather permits in Sioux Valley township. There is seldom a day that I ride that I do not see eagles. There are several eagles nests in the area. If the Three Water Wind project goes through it will be harmful the the eagles. That is not exceptable. It is not only the eagles. We have a lot of wet lands in this area. Flocks of other bird species will be disrupted as well. Herons make their home here on the lake and the Little Sioux river.

We farm and have spent a lot of money tiling our farms. Farming is our livelihood. Three Waters Wind project will destroy a lot of the tiles putting up their turbines and repairing them. Three Waters Wind claim they will fix them. To whose specs and timelines? We will not sign up but our tiles connect with some of the neighbors farms. If they sign up our tile lines will be affected. We will then have no control over how and when they will be fixed.

Another problem is crop spraying with airplanes. A lot of the people that fly those planes do not like to or refuse to spray with turbines on the fields. I don't blame them. It is dangerous to do so. This also hurts our lively hood and theirs.

I and my husband Jon believe that some of the information that supports the project is misleading. Such as the land owner maps are under negotiation and they are not. They try to get people to sign up because they think their neighbors are. They have not been totally truthful. If they are not truthful about this what else are they not truthful about.

Thank you,

Susan Untiedt and Jon Untiedt



**From:** [Thomas Behrends](#)  
**To:** [Davis, Richard \(COMM\)](#)  
**Subject:** "Public Comment: Three Waters Wind Project (CN-19-154 and WS-19-576)"  
**Date:** Thursday, February 27, 2020 5:51:45 PM  
**Attachments:** [Three Waters Comments.docx](#)

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Mr. Davis,

Please accept my attached comments for the denial of the permits for the Three Waters Wind Project. I hope after your review that the determination is made that this project is not a good fit for our state, it's residents, it's wildlife, and it's land.

I have sent the comments via USPS also.

Thank you,  
Tom

**Comments for:**  
**Preliminary Draft Site Permit and Environmental Report Scoping**  
**Three Waters Wind Farm**  
**Docket Nos. CN-19-154 and WS-19-576**

Noise is one of the human impacts that have people across this country revolting against the industrial wind turbine industry. I know first hand how a rural family's life is ruined by living in close proximity to industrial wind turbines. I came back from Iraq in 2007 to two of them approximately 1,000' from my rural home. We used to live here, enjoying time outdoors, sleeping with the windows open, listening to nature. Now we merely exist, trapped in the house, playing white noise to drown out the incessant noise that is allowed by our government.

One of the things that just seemed wrong from the beginning of my fight with Excelon over the placement of the turbines, was the modeling of the noise that was done on a computer to determine the setback. I questioned how after nearly ten years of turbines being in operation in Minnesota how we were not using actual sound measurements and data from turbines that were in operation. Instead a model is used based on atmospheric conditions in Europe I believe, which is not the upper Midwest. We have heavier more humid air, and when the conditions are right the sound carries further than in other climates. We have all heard a helicopter on those types of days when they sound like they are right by you but are a long way off.

The industrial wind turbine industry has been lying and deceiving this country's citizens and public utility commissions for the entire time modeling has been used to determine setbacks. To start with they say all turbine noise output is 105-107 decibels at the turbine. I don't know what state or country that noise level data comes from, but turbines in Minnesota's atmospheric conditions put out upwards of 120 decibels at times at the turbine. If you use the manufacturers fake decibel level and plug the number into the inverse square law (<http://hyperphysics.phy-astr.gsu.edu/hbase/Acoustic/isprob2.html>), you can place a turbine right at 1,000 from a residence and meet Minnesota's too high decibel level. If you use the decibel level that is actually being produced by a turbine in Minnesota the distance becomes a half mile or more. The wind developers use the manufacturers decibel level as it fits perfectly into their model, allowing turbines to be sited too close to residences. If they used actual data from on the ground in their modeling, most projects would not happen as the layout of our farmland in square miles would prevent turbine layout. Do we want another Bent Tree situation or lawsuit because we allowed turbines to be built that shouldn't have?

It doesn't matter to the manufacturer if the turbine is 1.5 or 3.2 MW, they say they all put out the same amount of noise. That is the same as saying a jumbo jet makes the same noise as a small private jet. So common sense would say that Three Waters 3.03 MW turbines should have a greater setback than the 2.82 MW turbines. The project by Lakefield used 1.5 MW turbines and their modeling determined they needed to have a 1,500' setback. How can a turbine twice that size have a 1,320' setback?

They say our background noise in a rural area is around 30 decibels. How and why can the state say that we should have to tolerate 50 decibels? Most of us that live in the country do so to get away from noise and chaos. Isn't it considered a nuisance to take someone's peace and quite away and replace it with something they didn't want? Doesn't the standard include all noise, not just the turbine noise over and above the ambient level?

It has been said that there are no known health consequences from living next to industrial wind turbines. What about sleep deprivation? I personally get woke up 20 nights per month by the noise. It is a fact this is not good for a person's health. Falmouth, Massachusetts has found that the turbines are a nuisance because of their health effects. Do we want to keep building these in peoples back yards when more and more lawsuits are popping up?

Shadow flicker should be zero hours per year, not 30 as allowed. It should be named shadow torture because when it occurs it is intolerable.

Using a ground factor of anything over 0.0 is improper due to elevated noise source. Utilizing 0.5 to 0.7 as is in the permit is improper.

What does the noise level do to our livestock and wildlife? Has that been studied to determine if there is reduced weight gain and stress? What science is used by the Minnesota Department of Commerce to determine setbacks?

The whole situation with industrial wind turbine setback and noise levels reminds me of the Volkswagen emissions scandal. The company makes the car and intentionally programs the car to pass emission standards when it is tested. Then after the testing is complete the car goes back to violating the Clean Air Act standard as if nothing happened.

([https://en.wikipedia.org/wiki/Volkswagen\\_emissions\\_scandal](https://en.wikipedia.org/wiki/Volkswagen_emissions_scandal))

So, wind turbines are allowed to be built too close to our fellow citizens homes, based on inexact or no science, and a skewed computer model. Once they are operational, they are tested to see if they comply, usually under very little load and probably on nice sunny days so the inspectors and the equipment don't get rained on. I'm sure rain or moisture would make the test invalid anyways. Then once they are signed off on as being in compliance, the industrial wind turbine developer turns them up to full load, and the helpless homeowner is relegated to a life of living hell.

Take a look at GE's "How Loud is a Wind Turbine" slide. Supposedly the turbine makes 105 decibels of noise, comparable to a lawnmower. At 100 meters the sound level supposedly drops down to 50 decibels, the same as a window air conditioner. At 300 meters a popup shows that wind turbines are placed no closer than this to the nearest house. If this slide from GE was honest and true, why wouldn't industrial wind complex developers place the wind turbines a little over 100 meters (328 feet) away from the nearest house to stay within the too high Minnesota state mandated 50 decibel threshold. Where is the science and what is the truth? And anyone who has been by a wind turbine when they are under load and thumping away knows they are a heck of a lot louder than a lawnmower.

Have there been any studies on vibration from the turbines going through the ground and into a home's foundation, disturbing the residents inside? This seems to be an issue worldwide and needs to be addressed.

There have been numerous industrial wind turbine fires across this country, including two that I have witnessed myself in SW Minnesota. It appears turbines can be built relatively close to our pristine wetlands. The setbacks from all wetlands and water should be greater to mitigate the risk of toxic chemicals and oil should a turbine fire occur. We need to mitigate the risk of an unwanted fire in our beautiful DNR and Fish & Wildlife areas by increasing the setbacks there also. We are restricted from burning during the nesting season. Turbines should be placed far enough away where a fire cannot make it into the prairie grass or they should be shut off during the spring nesting season to avoid unwanted loss of wildlife. I demand an Environmental Impact Statement for this topic and other known significant impacts.

A possible method to address the potential impacts of the proposed project is to deny the permit as the land is too sensitive to the environmental destruction that will occur. Rural homes are too close to proposed turbine sites. The name "Three Waters" tells it all as a place that should be left to nature and peaceful country living, not an area to exploited for money and greed and destroyed forever.

There is no need for the project. It is a want, not a need. The power company has enough electricity to sell to its customers. It wants to get to 100% renewable. There is no need to get to 100% renewable. There is no room in the grid for additional electrical generation, and no need for it (<https://www.dglobe.com/business/energy-and-mining/4963536-No-room-in-the-grid>). Even if there was a need it would make more environmental sense to put up solar panels on the farm land along Interstate 90, next to the existing power line.

This is a unique area with a growing resident bald eagle population. The studies done do not include all the nests and areas where the bald eagles live. It seems that Three Waters did the study to suit their needs, turning a blind eye to where all the eagles actually are. How many eagles do they predict that they will kill? Have they applied for an eagle take permit? What about all of our other raptors that hunt up and down the waterways that encompass the project? Who speaks for them? The Lakefield project projected a certain amount of bird and bat kills. If I am not mistaken, they were projected way below what actually occurred. What stipulations are in place for when Three Waters is wrong in their projections? It shouldn't just be a fine or a slap on the wrist, the turbines should be shut down, permanently.

One of the biggest concerns I have heard from this project is the lies and deceit that the company uses in trying to secure enough land for the project. This is an ongoing problem across this great country of ours. There is so much money changing hands that people from the land owner, turbine manufacture, developer, and even politicians are swept up in the money and greed. Rather than take a blank map and add landowners as they sign up, developers take a map and cross land owners off when they don't sign up. So, when they show other land owners the map, they think the neighbor has signed up and some figure they might as well also as the turbines will be next door anyways. Then when the neighbors talk it is found out that the developer has

deceived them by showing turbines on land where they are not signed up yet. This was brought out at the meeting last Thursday by several landowners. How many contracts were signed under duress by people who thought the neighbors had turbines anyways, only to find out later that they didn't? The whole project should be halted and started over with honesty, start with a clean slate and fill in the blanks. Not start with a slate that has the blanks filled in and then cross them off. It is up to you to make these deceitful industrial wind turbine developers to be honest. I request that all contracts be declared null and void as many may have been signed under false pretenses and duress. Make Three Waters start over and do the leaseholder agreements honestly.

Decommissioning is mentioned, that Three Waters will take care of it. I request that \$500,000 for each turbine be placed in escrow for decommissioning. There is no guarantee that Three Waters will even be in existence 10 years from now, let alone 35 years. The only way to guarantee that the landowner or our government isn't stuck with the decommissioning bill is to have the money set aside up front. We cannot allow such a risk to continue to go on in the permitting process. Companies go bankrupt all the time. Do we want to burden our citizens or government with a multi-million-dollar decommissioning bill that we could have prevented? It was also brought up at the meeting about what Three Waters is going to do with the turbine blades when they need to be replaced. We pride ourselves in our recycling activities in this country. Three Waters needs to be required to have a plan and facility to recycle the used blades into something useful, not buried in a landfill to never decompose. I request that you require them to have a recycling plan in place, facility constructed and ready to use, and money in escrow.

I request a contested case to vet the noise and other issues of the permit.

In conclusion, my main concern is the misleading, inaccurate information used by the entire industrial wind turbine industry to put turbines where they shouldn't be allowed. It seems that it is common practice to use lies and deceit, and money, to get projects off the ground and permitted. It starts with the turbine manufacturers stating that the turbines only put out 105-107 decibels. That fits right into the developers computerized modeling of turbine placement, which in turn fits right in with the 50-decibel level that government agencies use as how much noise we are supposed to tolerate in our formerly peaceful rural areas. The modeling is skewed towards the wind industry, which allows turbines to be built where they shouldn't be, which in turn ruins people's homes and lives.

Something was said at the meeting how it would be cruel and unusual punishment to listen to turbines in a noise study, that is what living next to wind turbines is.

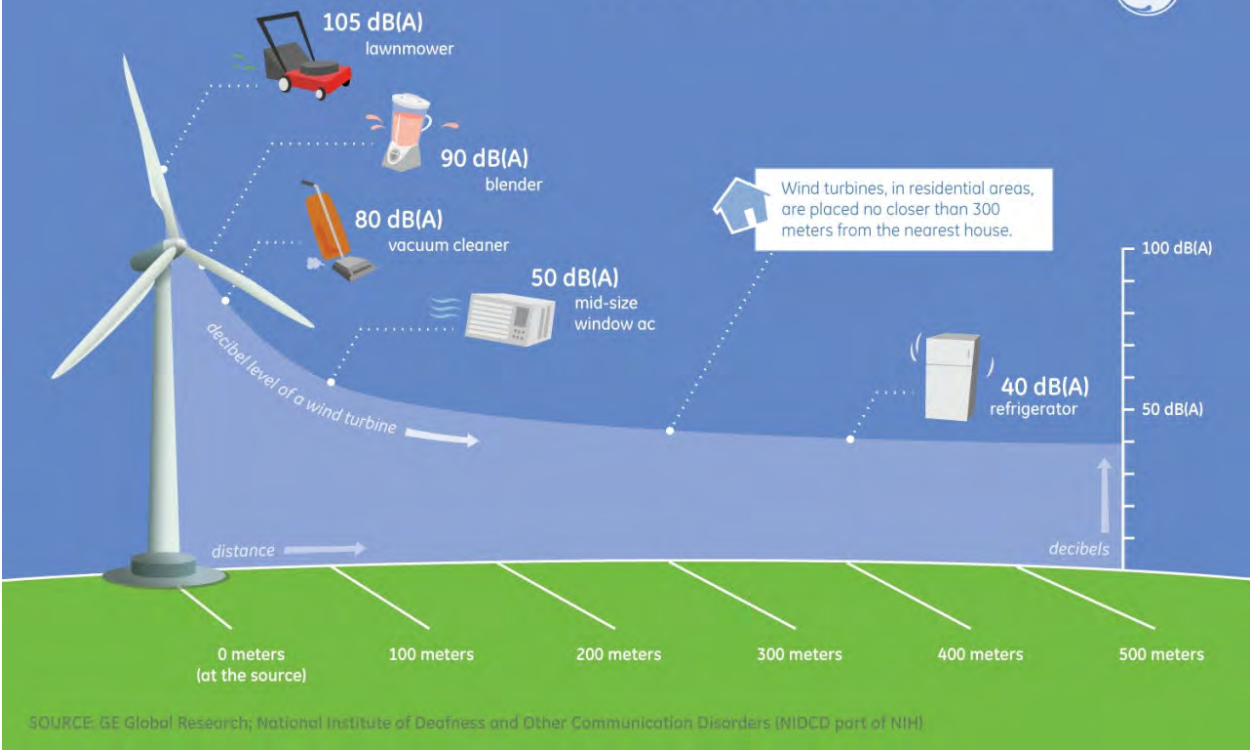
A moratorium needs to be placed on all industrial wind turbine construction until these issues are resolved.

You may contact me at (507) 360-3057 or [thomas.behrends@gmail.com](mailto:thomas.behrends@gmail.com).

Respectfully submitted,

Thomas Behrends

# How Loud Is A Wind Turbine?





**From:** [Wufoo](#)  
**To:** [Staff, CAO \(PUC\)](#)  
**Subject:** Submitted Public Comment Form  
**Date:** Tuesday, February 25, 2020 9:59:52 AM

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Name *	Verlon Ponto
Address	<input type="checkbox"/> 36734 760th Street Round Lake, MN 56167 United States
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Provide the docket's number. *	19-576

Leave a comment on the docket. \*

We live within one mile of the Three Waters Wind Project and are opposed to this project for many reasons. The project salesmen have been harassing landowners to sign either agreements for wind towers or "good neighbor agreements" by lying to people. They lie to people that the neighbor has signed an agreement when the reverse is true; the neighbor specified has refused numerous times. If the person they contact is not at home, they are breaking the federal law of placing information in their mailbox without postage attached. We are attaching a download (File title of USPS illegal placement.) direct from the United States Postal Service concerning this law.

We understand that there is a one mile setback from Department of Natural Resource land. Why should homes, churches, cemeteries be any different? The flicker and noise to humans should be as important as birds and animals.

They have also contacted churches to attempt to have the church sign this "good neighbor agreement." Where are their morals?

We understand that the grid is full by an article placed in the local paper (file attached as Globe article 1). As stated at the public meeting held at Jackson County Central High School on Thursday, February 20, 2020, Three Waters Wind Project Mark Wengierski stated that the power from this project has been sold to the Minnesota Municipal Power Agency.

We are concerned that our property will be devalued because of these monstrosities. Such has been the case in neighboring states as well as Ewington and Heron Lake township north of Lakefield.

In closing, it was documented that the public meeting on February 20, 2020 proved that the Three Rivers Wind Project is not feasible because there were numerous questions that were not answered to the public.

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