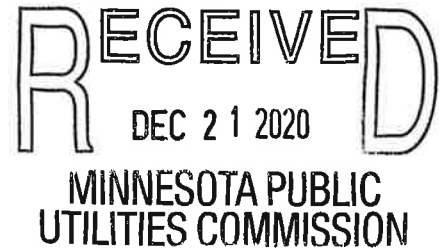




Tribal Historic Preservation Office
Lower Sioux Indian Community
P.O. Box 308 | 39527 Reservation Hwy 1
Morton, MN 56270

December 11th, 2020

Mr. Will Seuffert
Executive Secretary
Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147



RE: Apex Energy- Big Bend Wind Farm Project; Cottonwood, Watonwan and Martin Counties, Minnesota.
Route Permit: IP7013/TL-19-621
Site Permit: IP7013/WS-19-619
Cert. of Need: IP7013/CN-19-408

Mr. Seuffert,

The Tribal Historic Preservation Office (THPO) submits this letter on behalf of the Lower Sioux Indian Community in the State of Minnesota to cite concern and opposition regarding Apex Energy's Big Bend Wind Farm project.

The applicant proposes to construct 56 wind turbines and transmission lines in and near the Red Rock ridge, known to the Mdewakanton Dakota as *Inyan ʃa bdownʃida*. This spiritually significant location is one among many in a network of sites located in southwest Minnesota. The Jeffers Petroglyphs is directly located on and adjacent to the Red Rock Ridge, the direct area of effect proposed for the Big Bend Wind project.

Since 2018 the Lower Sioux THPO and Community Council has met several times with the Apex Energy and Quality Services Inc., conveying concerns about viewshed analysis and fieldwork methodologies. During viewshed analysis review Tribal partners reiterated request study for an established minimum buffer zone of eight miles from the nearest turbine to Jeffers visitors center. The final analysis included design of images from low points of the ridge, larger turbines than discussed in consultation and a lesser buffer zone of five miles. The applicant has disregarded request for viewshed protection of the Red Rock Ridge and Jeffers Petroglyph historic site, a site listed in the National Register of Historic Places.

Additionally, the Lower Sioux THPO participated in the 2019-2020 archaeological fieldwork and survey for this project through Apex Energy's consulting research group Quality Services Inc. Invitations to tribes for participation in an oral history project were sent in 2019. Inviting tribes to participate in the creation of a permanent record for the project, yet omitting tribes from opining on principles, professional and technical standards, and dissemination, does not meet the standards of consultation. It was not made clear how the information gathered will be used nor who will access this information. There are over 14 Tribes from across the region which participated in fieldwork, each having a different strategy and methodology for conducting fieldwork, the indeterminate practices of completing the fieldwork, were not properly coordinated. Upon completion of October

¹ (MS 116D.02 Sub. 2(4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever practicable, an environment that supports diversity, and variety of individual choice;

2020 fieldwork, no survey reports or updates were shared. THPO's had no input on how the fieldwork and survey findings were transcribed into the site applications and final records.

The significance of Red Rock Ridge is one of immense cultural importance for the Mdewakanton Dakota at Lower Sioux Indian Community, utilized today by traditional practitioners for prayer, tutelage and ceremony. It is a place of spiritual richness partly because of the solitude, ambience, and environment. To allow 56 wind turbines and placement of transmission lines will surely destroy the cultural integrity of this site. As directed by State statute we have a responsibility to protect such locations for future use and practice. (MS 116D.02 Sub. 2(4)¹

We respectfully urge the Public Utility Commission to consider the detrimental impacts of this project to Red Rock Ridge and the Jeffers Petroglyph historic site and oppose building of the Big Bend Wind project.

Thank-you,



Cheyenne St. John, THPO
Lower Sioux Indian Community

Cc:
Robert Larsen, Comm. Council President, LSIC.

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