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April 30, 2021

By eDockets

Mr. Richard Davis
Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Re: Comments on the Scope of the Environmental Assessment for Docket Numbers IP-7013/CN-19-408; IP-7013/WS-19-619; IP-7013/TL-19-621; IP-7014/CN-19-486; IP-7014/GS-19-620

Dear Mr. Davis,

My firm represents the Lower Sioux Indian Community in the State of Minnesota (the "Community") and presents this letter on its behalf. The Community thanks you for the opportunity to provide input regarding the scope of the Environmental Assessment (the "EA") that the Minnesota Department of Commerce, Energy Environmental Review and Analysis, will prepare for this unprecedented hybrid wind- and solar-energy project (the "Project").

The Community is a federally recognized Indian tribe, Indian Entities Recognized by and Eligible to Receive Services from the United States Bureau of Indian Affairs, 86 Fed. Reg. 7554, 7556 (Jan. 29, 2021), whose ancestors inhabited large swaths of what is now the State of Minnesota, including the proposed site for the Project. Of significance to the Community is the site's close proximity to the Jeffers Petroglyphs and the Red Rock Ridge, which is both a historic landmark and an active place of ceremony and spiritual engagement for the Community and numerous other Indian tribes. To help ensure that the EA thoroughly and thoughtfully addresses this and other important issues relevant to the Project, the Community submits the following comments regarding the scope of the EA.

Unique Site Characteristics and Considerations

The proposed site for the Project is roughly five miles from the Jeffers Petroglyphs and the Red Rock Ridge. This site is one of the oldest known evidence of human existence in Minnesota and North America, with over 5,000 rock carvings dating back at least 7,000 years. It has been a statutorily designated historic site since 1965, Minn. Stat. § 138.662, subd. 17; 1965 Minn. Laws 1186, has been listed on the National Register of Historic Places since 1970, *see* National Register of Historic Places Inventory – Nomination Form (verified Oct. 15, 1970), and is managed by the Minnesota Historical Society. It is, by any definition, a pivotal component of this state’s and this continent’s history.

But more importantly, the Jeffers Petroglyphs and Red Rock Ridge is a historic and contemporary place of worship for numerous federally recognized Indian tribes, including the Community. People from all over the country, and particularly from the Community, travel to this sacred place to take part in ceremonies, prayer, and other spiritual activities. They also come to this place to connect with their ancestors. The solitude of this sacred site is an essential component of the experienced that the Community’s members come to participate in. Impairment of that solitude would substantially jeopardize their ability to participate in their culture.

Furthermore, the Jeffers Petroglyphs and the Red Rock Ridge is part of a much larger network of sacred sites that represent the Dakota concept of *Kopemni* that stretches westward into Montana and are known to multiple Indigenous groups throughout the Midwest region. Thus, impact to the Jeffers Petroglyphs and the Red Rock Ridge is also impact to this greater network of sacred sites.

The EA should include detailed analysis of the impact of the Project to the viewshed from the Jeffers Petroglyphs and Red Rock Ridge, as well as of other impacts, such as noise and vibration, all of which would impair the spiritual experiences of those who come to worship at this sacred place and some of which could endanger the formations and carvings. With respect to the viewshed, the Community agrees with the Minnesota Historical Society’s recommendations regarding the Visual Impact Assessment and requests that the EA incorporate those recommendations. The Community also requests that it be consulted in further assessment of the viewshed impacts from the Project.

Relatedly, and of particular note, the EA should acknowledge and account for the fact that every federally recognized Indian tribe, including the Community, has been subjected to generations of federal and state policies designed to eliminate their distinct cultural existence. The evidence of this abounds in the history of reservation

policies, boarding schools, allotment acts, termination policies, and the like. This Project has the distinct potential to contribute to the larger national theme of cultural genocide (intentionally or not) by imposing on and impairing the Community's and other Indian tribes' abilities to engage in ceremonies and spiritual activities that are essential to their distinct cultural existence. Furthermore, because the Jeffers Petroglyphs and the Red Rock Ridge is a part of a larger network of sacred sites, the EA should consider the impacts of the Project to the entirety of that network of sacred sites.

In addition to the Jeffers Petroglyphs and the Red Rock Ridge, the site is home to remnants of the less than four percent of original prairie land left in North America. These hardy ecosystems, made fragile by the relentless agricultural movement, are home to an abundance of wildlife, and serve our environment by preventing soil erosion and storing carbon.

The Community requests that the EA give significant weight to these crucial site characteristics. The Jeffers Petroglyphs and Red Rock Ridge cannot be moved or duplicated. They are fixed. And they are sacred and priceless to the Community and numerous other federally recognized Indian tribes. Additionally, original prairie lands are pivotal to the health of the local community and environment. And once lost, efforts to fully restore them to their pre-agricultural state will take generations. Thus, *any* impacts to the integrity and health of either of these unique site characteristics will be largely permanent.

In a related vein, the Community requests that the EA consider whether the Project meets the letter and spirit of state and federal environmental- and religious-preservation and equal-protection laws, including the Minnesota Environmental Rights Act, Minn. Stat. ch. 116B, the Minnesota Environmental Policy Act, Minn. Stat. ch. 116D, and the National Historic Preservation Act, 16 U.S.C. § 470 *et al.*, the American Indian Religious Freedom Act of 1978, 42 U.S.C. § 1996, the First and Fourteenth Amendments of the United States Constitution, U.S. Const. amends. I, XIV, and Article I of the Minnesota Constitution, Minn. Const. art. I. Though not all of these laws directly apply to the Project, they nevertheless provide guidance on proper considerations for the Project. Deviation from the purposes of these laws will not only impact these important site characteristics and the Community's cultural and religious freedoms, but also undermine modern state and federal policy.

Environmental Impacts

The Community recognizes that there are environmental advantages to renewable energy sources over other energy sources. But it also knows that the environmental impacts of wind and solar farms are not negligible. The life cycles of

windmills and solar panels involve a number of phases, including but not necessarily limited to (1) sourcing and transporting raw materials, (2) manufacturing and transporting component parts, (3) construction and related activities, (4) operation, maintenance, recycling, and waste, and (5) decommissioning and dismantling. Each of these phases create their own burdens on the environment, and they should all be considered in the EA.

Additionally, the scope of the EA should not be limited to impacts directly linked to life cycles of the windmills and solar panels. It should also address a battery of other considerations, including but not limited to the following:

- Disturbance to or impairment of surrounding original prairie land and other soils and resulting release of carbon and reduction to the surrounding carbon sink. In particular, the EA should consider the dwindling original prairie lands in Minnesota and the substantial long-term impacts that their continued diminishment will cause;
- Disturbance to other natural habitats and ecosystems, including, but not limited to, local wetlands;
- Disruption of and interference with local efforts to rehabilitate the natural environment near the Project; and
- Impact to resident and migratory wildlife, including inadvertent destruction of birds, bats, and the local eagle population and potential impacts to migratory routes.

Again, while the Community generally supports the use of renewable energy sources and understands that they generally have less impact to the environment than other sources of energy, it advises against broad assumptions that the Project is *per se* harmless and requests that the environmental impacts of the Project be addressed thoroughly.

Human Impacts

The Community understands that human-health impacts from wind and solar energy are limited. But again, they are not negligible, and the Project as proposed will be woven tightly into the fabric of the surrounding community.

With respect to the wind-energy component of the Project, the Community requests that the EA consider the known potential for sleeplessness, headaches, stress, hearing problems, heart palpitations, anxiety, and depression. The Community also

requests that the EA consider potential socioeconomic impacts of the wind-energy component of the Project. With respect to the solar-energy component of the Project, the Community requests that the EA consider the potential for improper disposal of solar panels and potential harmful impacts to human health, as well as the potential harmful impacts to human health from toxic chemicals used to clean the solar panels. And with respect to the Project as a whole, the Community requests that the EA consider the impacts of long-term exposure to electromagnetic fields in and surrounding the site.

The EA should also address the Project's potential impacts to property values and uses in the local community, as well as potential impacts to private and public funding for management of the Jeffers Petroglyphs and Red Rock Ridge.

Infrastructure

The Community requests that the EA take into consideration impacts to local utilities and infrastructure. The Project will necessitate significant ground disruption, as well as increased heavy machinery and traffic, which could require road closures, adjustments, and maintenance to other utilities, such as gas, phone, water, and sewer. These impacts not only have a direct effect, but also could result in greater environmental costs, which should also be considered.

Need

To the Community's knowledge, there are no established purchase agreements for energy that would be generated by the Project. And the Community's understanding is that energy generated by the Project will likely be directed to the greater energy grid and serve other regions, including the metropolitan area. The Community therefore requests that the EA address two things:

- The regional energy need, taking into account its numerous local and distant energy sources, including the significant number of renewable energy sources that already exist or will soon exist in the region; and
- The statewide and metropolitan-specific energy need, taking into account not only the existing sources of energy, but also the projected energy sources that have either been approved by the Commission or are likely to be approved in the near future and trends in small-scale and residential energy production.

The Community requests that this component of the EA look in particular at the propriety of the high voltage transmission line.

Alternatives

The Community believes that a number of alternatives are available and request that the EA give them consideration:

- No-build.
- Solar only project. This alternative can include additional solar panels and necessary modifications to the high voltage transmission line.
- Eight-mile buffer from the Jeffers Petroglyphs and Red Rock Ridge. This alternative can include mixed wind-energy and solar-energy components with all wind-energy components located outside of the eight-mile buffer and no taller than 570 feet (ground to blade tip).
- Ten-mile buffer from the Jeffers Petroglyphs and Red Rock Ridge. This alternative can include mixed wind-energy and solar-energy components with all wind-energy components located outside of the ten-mile buffer and no taller than 660 feet (ground to blade tip).
- Eleven-mile buffer from the Jeffers Petroglyphs and Red Rock Ridge. This alternative can include mixed wind-energy and solar-energy components with all wind-energy components located outside of the eleven-mile buffer and no taller than 660 feet (ground to blade tip).

The Community acknowledges that alternatives ideally should include some level of specificity but does not believe that alone is a basis to disregard any of the above alternatives. The Community does not have the resources or time to develop detailed project alternatives for the Applicants, particularly given the expeditiousness of this comment period. The Community believes that the above alternatives provide sufficient detail for the EA to provide comparative analysis.

Additional Considerations

Under Executive Order 19-24 (Apr. 4, 2019), all state agencies are required to engage Indian tribes within Minnesota early and consistently through all decision-making processes. The Community requests that it and the other interested Indian tribes in Minnesota be provided meaningful consultation in the EA development to identify potential impacts of the Project, mitigation strategies, and alternatives.

Additionally, the Community requests that other federally recognized Indian tribes with historical or spiritual connections to the Jeffers Petroglyphs and Red Rock

Ridge be engaged in the EA development process. While Executive Order 19-24 does not itself require consultation with Indian tribes outside of Minnesota, there are numerous other Indian tribes that have a historical and spiritual connection to the Jeffers Petroglyphs and Red Rock Ridge, whose interests in this Project cannot be overstated.

To enhance tribal consultation, the Community requests that the United States Environmental Protection Agency's *Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples* be used as a reference.

* * *

These comments do not constitute a comprehensive list of considerations for the EA. The Community requests and believes that the Department of Commerce, will incorporate not only issues raised during this comment period but also issues that it believes are relevant, including, but not limited to, any items that it believes are missing or mischaracterized in the applications for the Project. The Community also reserves the right to raise additional considerations as circumstances change or new information comes to light.

Again, the Community thanks you for the opportunity to provide input on the scope of the EA. The Community is committed to ensuring a thorough and thoughtful review of the Project and will continue to cooperate with the EA development.

Sincerely,



Peter J. Rademacher

*Counsel for the Lower Sioux Indian
Community in the State of Minnesota*

STATE OF MINNESOTA
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Big Bend Wind, LLC for a Certificate of Need for the up to 308 MW Big Bend Wind Project in Cottonwood and	MPUC No.: IP-7013/CN-19-408
Watonwan Counties, Minnesota; In the Matter of the Application of Big Bend Wind, LLC for a Large Wind Energy Conversion System Site Permit for the up to 308 MW Big Bend Wind Project in	MPUC No.: IP-7013/WS-19-619
Cottonwood and Watonwan Counties, Minnesota;	MPUC No.: IP-7013/TL-19-621
In the Matter of the Application of Big Bend Wind, LLC for a Route Permit for a 161 kV High Voltage Transmission Line in Cottonwood, Watonwan and	MPUC No.: IP-7014/CN-19-486
Martin Counties, Minnesota; In the Matter of the Application of Red Rock Solar, LLC for a Certificate of Need for the up to 60 MW Red Rock Solar Project in Cottonwood County, Minnesota; and In the	MPUC No.: IP/7014/GS-19-620
Matter of the Application of Red Rock Solar, LLC for a Site Permit for the up to 60 MW Red Rock Solar Project in Cottonwood County, Minnesota.	OAH No.: 60-2500-37376

Declaration of Service

STATE OF MINNESOTA)
) ss.
COUNTY OF DAKOTA)

I, Peter J. Rademacher, hereby state that on April 30, 2021, I filed by electronic eDockets the Lower Sioux Indian Community in the State of Minnesota’s Environmental Assessment Scoping Comments, and eServed or sent by U.S. mail, as noted, to all parties on the attached service list(s).

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: April 30, 2021

/s/Peter Rademacher
Peter J. Rademacher

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-408_19-408
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-408_19-408
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-619_19-619
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-620_19-620
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_19-620_19-620
Brenna	Gunderson	Brenna.gunderson@apexcleanenergy.com	Apex Clean Energy	8665 Hudson Blvd N Ste 110 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-620_19-620
Kate M	Heins	kate.heins@apexcleanenergy.com	Apex Clean Energy	310 4th St NE Ste 200 Charlottesville, VA 22902	Electronic Service	No	OFF_SL_19-620_19-620
Amy	Kania	akania@hogenadams.com	Hogen Adams PLLC	1935 County Road B2 West Suite 460 St. Paul, MN	Electronic Service	No	OFF_SL_19-620_19-620
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_19-620_19-620
Chris	Kunkle	chris.kunkle@apexcleanenergy.com	Apex Clean Energy	8665 Hudson Blvd North, Suite 110 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-620_19-620
James	LaFave	james.lafave@state.mn.us	Office of Administrative Hearings	600 N Robert Street St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-620_19-620

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha J	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_19-620_19-620
Peter	Rademacher	prademacher@hogenadams.com		1935 County Road B2 West Suite 460 St. Paul, Minnesota 55113	Electronic Service	No	OFF_SL_19-620_19-620
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-620_19-620
Ronald C	Schirmer	ronald.schirmer@mnsu.edu	Department of Anthropology	359 Trafton Science Center N Mankato, MN 56001	Electronic Service	No	OFF_SL_19-620_19-620
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-620_19-620
Cheyenne	St. John	cheyenne.stjohn@lowersioux.com	Lower Sioux Tribal Community	39527 Reservation Hwy 1 Morton, MN 56270	Electronic Service	No	OFF_SL_19-620_19-620
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-620_19-620

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	Yes	OFF_SL_19-621_19-621
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-621_19-621
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-621_19-621
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_19-621_19-621
Brenna	Gunderson	Brenna.gunderson@apexcleanenergy.com	Apex Clean Eenergy	8665 Hudson Blvd N Ste 110 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-621_19-621
Kate M	Heins	kate.heins@apexcleanenergy.com	Apex Clean Energy	310 4th St NE Ste 200 Charlottesville, VA 22902	Electronic Service	No	OFF_SL_19-621_19-621
Amy	Kania	akania@hogenadams.com	Hogen Adams PLLC	1935 County Road B2 West Suite 460 St. Paul, MN	Electronic Service	No	OFF_SL_19-621_19-621
Chris	Kunkle	chris.kunkle@apexcleanenergy.com	Apex Clean Energy	8665 Hudson Blvd North, Suite 110 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-621_19-621
James	LaFave	james.lafave@state.mn.us	Office of Administrative Hearings	600 N Robert Street St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-621_19-621
Kevin	Majjala	Kevin.Majjala@mnhs.org	Minnesota Historical Society	N/A	Electronic Service	No	OFF_SL_19-621_19-621

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha J	Odegard	samanthao@upperSiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_19-621_19-621
Peter	Rademacher	prademacher@hogenadams.com		1935 County Road B2 West Suite 460 St. Paul, Minnesota 55113	Electronic Service	No	OFF_SL_19-621_19-621
Leif	Rasmussen	leif@staffensandrasmussen.com	Staffens & Rasmussen	6600 France Ave South Edina, MN 55435	Electronic Service	No	OFF_SL_19-621_19-621
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-621_19-621
Ronald C	Schirmer	ronald.schirmer@mnsu.edu	Department of Anthropology	359 Trafton Science Center N Mankato, MN 56001	Electronic Service	No	OFF_SL_19-621_19-621
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-621_19-621
Cheyenne	St. John	cheyenne.stjohn@lowersioux.com	Lower Sioux Tribal Community	39527 Reservation Hwy 1 Morton, MN 56270	Electronic Service	No	OFF_SL_19-621_19-621
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-621_19-621