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To: [Staff, CAO \(PUC\)](#)
Subject: Submitted Public Comment Form
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Provide the docket's number. *	IP7013/WS-19-619

Leave a comment on the docket. *

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

RE: Big Bend Wind and Red Rock Solar Projects
IP7013/CN-19-408; IP7013/WS-19-619; IP7013/TL-19-621; IP7014/CN-19-486; IP7014/GS-19-620

Dear Mr. Davis:

Regarding the applications Apex Energy has submitted for the Big Bend Wind Project and the Red Rock Solar Project.

In the Notice of Public Information you have asked for comments regarding a number of issues. I would like to propose changes that would address four of those issues regarding the Big Bend Wind Project. The issues addressed by these changes would be:

- What potential human and environmental impacts of the proposed project should be considered in the environmental assessment (EA), and/or the draft site permit?
- What are possible methods to minimize, mitigate, or avoid potential impacts of the proposed project?
- Are there any unique characteristics of the proposed site or the project that should be considered?
- Are there other ways to meet the stated need for the project, for example, a different size project or a different type of facility? If so, what alternatives to the project should be studied in the EA?

The human and environmental impacts:

Some of the human and environmental impacts of the proposed project are described quite well in the public comments written by Kevin Maijala of the Minnesota Historical Society. His letter from December 15th, 2020 helped pushed this project into a contested case hearing. The Lower Sioux Indian Community and the Upper Sioux Community are in agreement with him that the viewshed for the Jeffers Petroglyphs Historic Site will be severely compromised by this project.

I would add that the viewshed changes, along with the noise and shadow flicker, would also compromise the area for everyone else who lives nearby. While our homes, businesses, and houses of worship may not be deemed historical sites or spiritually significant like the Jeffers Petroglyphs, they hold many of those same values to us as local residents. Those who visit our local parks and other attractions would also be negatively affected.

And finally, there are the known dangers that wind turbines pose to the natural inhabitants of our area, including that of the Bald Eagle. Like much of the state, we have seen a significant increase in the Bald Eagle population, and wind turbines are a known danger to this protected species.

How to mitigate these impacts:

One simple and beneficial way to minimize these impacts would be to convert the entire project to solar.

Apex Clean Energy has made the case in their site permit that the area is conducive to both wind and solar development, since both are utilized in the proposed project. This unique hybrid system shows that Apex is capable and willing to build either type of system. Since this area is already the home to a large number of wind turbines, building a hybrid system that is mostly powered by wind will do very little to provide a dependable source of energy. A new project based solely on solar would help balance out our current dependence on wind and make for a more stable energy infrastructure.

While solar would require the use of more prime farmland, it appears that the State of Minnesota and the PUC believe that the solar portion of this project is worth that cost. Since this seems appropriate to do for a 60MW project, there seems to be little reason why the same couldn't be done for a 500MW project. And since the State and our national leaders are pushing for less dependence on fossil fuels, the demand for corn and ethanol will also be diminished.

In converting this project to all solar, Apex and the state could resolve a number of issues.

First and foremost, the issue regarding the Jeffers Petroglyphs Historic Site would be resolved. The viewshed effect from a solar farm is very limited. In most cases, the effect would be eliminated after a distance of less than one mile – unlike the eight mile or greater distance requested by the Historical Society for wind turbines.

Secondly, the effect on other landowners, as well as visitors and drivers, would be greatly mitigated. A solar project has far less impact on neighbors and others who are not participants in the project.

And finally, the risk that wind turbines pose to wildlife is removed.

Landowners who are currently signed up for the wind project could be given the option to host a solar site instead. In fact, the area available for the project could be expanded, since those landowners who live closer to the Jeffers Site could once again be considered.

These changes would not limit the size of the project in any way. The solar facilities could be expanded to produce even more energy, yet the human and environmental impacts created by the wind turbines would be eliminated. There are more landowners who have already expressed interest in a solar facility, and this conversion would allow others to get involved while diminishing the negative impacts that come with wind turbines.

Sincerely,

Brad Hutchison
34857 575th Ave
Mountain Lake, MN
