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To: [Staff, CAO \(PUC\)](#)
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Provide the docket's number.	19-619
Leave a comment on the docket. *	Comments are in attached file
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December 10, 2025

RE: The Big Bend Wind, LLC request to amend the existing Big Bend Wind Large Wind Energy Conversion System (LWECS) site permit

Thank you for the opportunity to provide input regarding this proposed amendment.

I am a homeowner within the proposed project area, and I strongly oppose approving this amendment. My opposition does not come from the specific changes being proposed. Instead I believe that a new Environmental Assessment is needed, with the following items to be included for consideration:

- 1) The current Environmental Assessment ("EA") is based on outdated data.
- 2) The settlement reached on 9/14/21 highlights environmental damage to area homeowners that have not been addressed.
- 3) Alternative plans.

The current Environmental Assessment ("EA") is based on outdated data

As noted in the Notice of Comment Period, the permit was originally issued to Big Bend Wind on September 28, 2022, and extended on December 23, 2024. The assessments performed to approve this project are outdated, having been performed in 2019 (background sound level monitoring) and 2020-2021 (Sound propagation modeling). Neither of these assessments can be depended on for their accuracy in 2025, nor for the proposed construction time in 2026.

While any number of factors might have changed after these assessments were performed, one in particular stands out. The area in which this project was approved has experienced a significant infestation of the Emerald ash borer. This has caused many existing groves and windbreaks to be significantly or completely decimated. With the loss of these old growth trees, which have made up a large portion of the trees in this area, both the current background noise and the modeling for turbine sound are no longer valid. This is a significant change in topography, contrary to what is stated on page 10 of the Site Permit Amendment request (eDoc 202510-224488-01).

In addition, without these large trees, it becomes even more apparent that the modeling for turbine noise using a ground factor of $G=0.5$ is not realistic. There will be little to no ground factor involved with the proposed turbines that stand 650 feet tall given the large reduction in tree cover.

Most critically, the outdated sound propagation modeling, as described on page 8 of eDoc 202510-224488-05, fails in both of these areas. The Site Permit Amendment request is false in claiming that the topography is not significantly different, and those changes should require a new EA.

The settlement reached on 9/14/21 highlights environmental damage to area homeowners that have not been addressed.

On September 14, 2021, a settlement was reached between Big Bend Wind, LLC and the Minnesota Historical Society, along with other parties. In working towards this settlement, the

Minnesota Historical Society wrote a letter with their concerns (eDoc 20214-173618-02). Their concern was primarily with the visual impact for the Jeffers Petroglyphs and the adverse effects caused by having wind turbines within 3-4 miles of the site. In this letter the Minnesota Historical Society argued that a buffer of ten miles from these turbines should be considered. The final Settlement Agreement (eDoc 20219-177943-05) resulted in turbine locations being moved to a distance of seven miles from the Jeffers site. This was determined to be an acceptable distance for keeping the adverse effects of these turbines to a minimum.

In the meantime, those of us who are homeowners in the area are told that a distance of just over one quarter mile (three times the rotor diameter) is a sufficient distance for avoiding any adverse effects from the same turbines. This is refuted by all of the parties that signed this agreement. Their comments and ultimate agreement indicate that a seven mile buffer is the minimum distance needed to limit this environmental harm. The visual impact of turbines has long been a major concern for homeowners and our homes deserve the same protections from these adverse impacts as is given to properties that the state deems valuable.

In addition to this, another condition of this settlement agreement is in need of further environmental assessment. This agreement granted a waiver of the wind access buffer setback for turbines placed near the personal property of residents. The roughly one quarter mile buffer was made even smaller. This has left homeowners with no recourse other than to give up and sign an agreement with Big Bend that they have been opposed to for years. If these homeowners still refuse, this agreement allows Big Bend to ignore the setback guidelines and intrude even further on the personal property and wind rights of these landowners.

I am thankful for how the Minnesota Historical Society and other parties have highlighted the environmental harm caused by the visual impact of wind turbines. They have brought to light serious environmental issues for homeowners that have not been addressed in any previous analysis. The Minnesota Historical Society requested that a Visual Impact Analysis be performed regarding the Jeffers site. That same care and analysis should be performed for area homeowners before this amendment is approved or this project is allowed to begin construction.

Alternative plans

Lastly, the burden of coming up with an alternative plan should truly be placed on those who have set the guidelines for wind development in the state of Minnesota. We are being told that we must live with these wind turbines near our homes, while at the same time these turbines are too environmentally damaging to be built near land that the state values.

This is a contradictory argument that state leaders should be asked to resolve. They should either embrace this technology that they support and build on or near government land first, or admit the irreparable harm to homeowners and pursue alternative energy production options.

Brad Hutchison
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