

April 29, 2021

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

RE: Comments on the Scope of the Environmental Assessment for the Big Bend Wind Project
Docket Nos: IP7013/CN-19-408 (certificate of need); IP7013/WS-19-619 (site permit);
IP7013/TL-19-621 (route permit)

Dear Mr. Davis:

Thank you for the opportunity for the Minnesota Historical Society to provide input regarding the scope of the Environmental Assessment ("EA") that will be prepared by the Minnesota Department of Commerce, Energy Environmental Review and Analysis ("EERA") for the proposed Big Bend Wind Project located in Cottonwood, Martin, and Watonwan counties ("Big Bend Wind Project" or "Project").

The Minnesota Historical Society is an educational and cultural institution dedicated to preserving the history of the state of Minnesota. The Minnesota Historical Society operates 31 historic sites and museums and one of these sites is the Jeffers Petroglyphs site. The Jeffers Petroglyphs site, located in Delton Township in Cottonwood County, Minnesota, is an internationally significant Native American sacred site and the location of the largest group of Indigenous petroglyphs (rock carvings) in the Midwestern United States. Situated in Dakota homeland, it is sacred to multiple Native American nations, including the Cheyenne, Arapaho, Iowa, and Ojibwe.

The Jeffers Petroglyphs site became part of the statutorily-defined Minnesota State Historic Sites Network in 1965 and was listed in the National Register of Historic Places in 1970. The site is open to the public annually from April through October, with up to 10,000 people visiting per year. Jeffers Petroglyphs site remains open and accessible every day of the year for Native American spiritual activities. The site has a ceremonial use protocol in place to ensure Native American spiritual practitioners have private access if needed.

The preservation and protection of Jeffers Petroglyphs site as both a state historic site and a place of spiritual and ceremonial importance to Native American tribes needs to be core to any review and assessment of potential impacts and adverse effects of the proposed Big Bend Wind Project. In order to ensure a full review and assessment of these potential impacts and adverse effects of the Big Bend Project, the Minnesota Historical Society requests, as outlined below, that the following should be included in the the scope of EA and EERA's review of the Project:

1. Minnesota Historic Sites Act Statutory Obligations - Responsibilities required by Minnesota Statute 138, especially 138.40 and 138.665
2. A full and thorough visual impact analysis, including standards-based evaluation.
3. Tribal Consultation - Full consultation with tribes
4. Analysis of alternate turbine locations, turbine height, and numbers of turbines in response by any adverse effects uncovered in steps 1-3.

Minnesota Historic Sites Act Statutory Obligations

As a statutorily-designated state historic site, Jeffers Petroglyphs site is afforded protections under the Minnesota Historic Sites Act, Minnesota Statutes Sections 138.661-669. The Minnesota Historic Sites Act states that state departments and agencies have a responsibility to “protect the physical features and historic character” of designated historic properties. [Minn. Stat. § 138.665](#), subd. 2. The law further stipulates that “prior to carrying out any undertaking that will affect [state historic sites], or funding or licensing an undertaking by other parties,” that a state department or agency must consult with the State Historic Preservation Office “to determine appropriate treatments and to seek ways to avoid and mitigate any adverse effects” on state historic sites. In addition, [Minn. Stat. § 138.40](#) requires consultation with the Minnesota State Archaeologist, Amanda Gronhøvd (651-201-2263).

The Minnesota Historical Society recommends that as part of the EA, EERA documents the consultation activities with State Historic Preservation Office and the Minnesota State Archaeologist and documents any actions or mitigation measures that are agreed to as part of these consultations to avoid and mitigate any adverse effects to the Jeffers Petroglyphs site.

Visual Impact Analysis

In order to assess the potential impacts of Big Bend Wind Project on the Jeffers Petroglyphs site, the Minnesota Historical Society recommends that a full and independent Visual Impact Assessment (VIA) be conducted as part of the EA. The Minnesota Historical Society would like, along with tribal nations, to be involved in selecting Key Observation Points (KOP's), lighting quality, and the range of views for photos to be used in the photographic simulations. Photographic simulations should illustrate the actual or expected appearance of the landscape and Project as closely as possible, according to the data available at the time. The VIA scope should include the range of views which would be experienced with the actual Project, under a wide range of viewing conditions.

- The VIA should include the highest elevated location on Jeffers Petroglyphs site as a KOP. This location has the most complete vantage point of the Big Bend Wind Project and will likely be the most impacted by the proposed Project. This location is also culturally important because of the 360 degree view. This is the most common location where tribal ceremonies are conducted. Visitors also are able to visit this location regularly during evening tours at the Jeffers Petroglyphs site. For this location, the VIA should include a photo that captures a panoramic angle from the east, south, and west and that depicts the worst case scenario/adverse effect on the viewshed from the Project. Bearings for the photo are 118.1 degrees east to 158 degrees west.

- The VIA should include the first boardwalk as another KOP. The boardwalk is located 430 yards east of the Jeffers Petroglyphs' visitor center. The boardwalk is the first stop by visitors on their tour of the Jeffers Petroglyphs and, as part of the tour, visitors are asked to look all around the landscape and reimagine how the landscape would have looked like in the past. The addition of large industrial scale wind turbines could affect a visitor's ability to reimagine the past and connect with history.
- The VIA should include the Jeffers Petroglyphs Astronomical Education Facility as a KOP. This location is used for astronomical activities and the proposed wind turbines could interfere with the locating of celestial bodies and events from this facility. This KOP should include a photo that depicts a viewpoint with an angle from east, south, and west with bearings 117.1 degree east to 156.7 degree west.
- The VIA should evaluate the placement of wind turbines with an 8-mile and a 10-mile buffer from the KOPs listed above. The VIA should include alternative turbine locations sites further away to meet the requested buffers or removal of wind turbines within the buffer zones and replacement of the output lost from these turbines through an increase in the megawatts produced by the Red Rock Solar project.

The Minnesota Historical Society recommends that EERA use the National Park Service's Guide To Evaluating For Renewable Energy Projects¹ as its methodology in analyzing the VIA, and identifying any potential adverse effects. This guide to evaluating historic viewsheds meets the Secretary of the Interior's Standards for the Treatment of Historic Properties.² The Minnesota Historical Society asks that the VIA and all analysis be shared when completed with all consulting parties, including tribes, Red Rock Ridge Research Group, the state archaeologist, State Historic Preservation Office, and the Minnesota Historical Society.

Tribal Consultation

In its March 11, 2021 Order, the Minnesota Public Utilities Commission recognized the importance of consulting with tribal nations to develop a full and complete record in this proceeding regarding potential impacts of the Big Bend Wind Project on the Jeffers Petroglyphs site.³ To fully assess the potential impacts and adverse effects of the Big Bend Wind Project, the Minnesota Historic Society encourages EERA, as part of the EA process, to conduct a full consultation with tribes, as required by Executive Order - 19 - 24,⁴ which would entail direct engagement with each of Minnesota's eleven federally recognized tribal nations.

¹ https://blmwyomingvisual.anl.gov/docs/NRR_VIAGuide-RenewableEnergy_2014-08-08_large.pdf

² <https://www.nps.gov/tps/standards.htm>

³ *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 Watonwan Counties, Minnesota*, Docket No. IP-7013/WS-19-619, ORDER ACCEPTING APPLICATIONS AS COMPLETE, ESTABLISHING REVIEW PROCEDURES, GRANTING VARIANCES, AND NOTICE OF AND ORDER FOR HEARING (March 11, 2021).

⁴ https://mn.gov/governor/assets/2019_04_04_EO_19-24_tcm1055-378654.pdf

As part of this consultation, the Minnesota Historical Society recommends that tribal representatives be able to select significant locations to be included in the viewshed analysis (discussed further below), voice concerns of potential adverse effects of the Project, and recommend potential mitigation strategies. To assist with this consultation, contact information for these eleven tribal nations is provided below:

Cheyenne St. John, Lower Sioux Indian Community (507) 697-6321
Samantha Odegard, Upper Sioux Community (320) 564-6334
Leonard Wabasha, Shakopee Mdewakanton Sioux Community (952) 496-6120
Noah White, Prairie Island Indian Community (320) 532-7780
Jaylen Strong, Bois Forte Band of Chippewa (218) 753-6017
Jill Hoppe, The Fond du Lac Band of Lake Superior Chippewa (218) 878-7129
Mary Ann Gagnon, Grand Portage Band of Chippewa Indians (218) 475-0111
Amy Burnette, Leech Lake Band of Ojibwe (218) 335-2940
Terry Kemper, Mille Lacs Band of Ojibwe (320) 532-7780
Jamie Arsenault, White Earth Reservation (218) 983-3285 ext 5807
Kade Ferris, Red Lake Band of Chippewa Indians (218) 679-1691

We strongly recommend, in addition, that this tribal consultation include exiled tribes, including the Flandreau Santee Sioux Tribe, Crow Creek Sioux Tribe, Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, Yankton Sioux Tribe, Standing Rock Sioux Tribe, Spirit Lake Tribe, and the Santee Sioux Tribe. The Minnesota Historical Society would also like Red Rock Ridge Research Group⁵ to continue to be consulted as this process continues. The group consists of American Indian elders, historians, and archeologists with extensive knowledge and experience researching and documenting cultural resources at the Jeffers Petroglyphs site.

Analysis of Alternatives

Lastly, the Minnesota Historical Society requests that several alternatives, including different wind turbine locations, different wind turbine heights, and a reduction in the number and density of turbines be evaluated in the EA. Specifically, the Minnesota Historical Society requests that the EA evaluate the removal of all wind turbines within 8 miles of the Jeffers Petroglyphs site property boundaries, a reduction in the height of the remaining turbines to no more than the 570 feet reflected in the July 2019 Visual Assessment completed by Apex, and that the output from the Project that is lost due to either the removal of the turbines or the reduction in height be replaced with an increase in the output of the Red Rock Solar project. In addition, the Minnesota Historical Society requests that the EA evaluate the removal of all wind turbines within 10 miles of the Jeffers Petroglyphs site property boundaries, a maximum height of the remaining turbines to no more than 656 feet (ground to blade tip) referenced by Apex in its permit applications, and that the output from the Project that is lost due to either the removal of the turbines or the reduction in height be replaced with an increase in the output of the Red Rock Solar project.

⁵ <https://www.facebook.com/Red-Rock-Ridge-Research-Group-752126371595264/>

Letter to Richard Davis
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Thank you for the opportunity to provide comments on the scope of the EA. We look forward to continued involvement with this Project through the contested case process conducted by the Office of Administrative Hearings and the Minnesota Public Utilities Commission.

Sincerely,



Kevin Maijala
The Josephine (Nicky) Benz Carpenter Chair for Education
Senior Director, Learning Initiatives
Minnesota Historical Society
345 Kellogg Blvd W
St. Paul, MN 55102-1906

cc via email:

David Briesse, Site Manager, Jeffers Petroglyphs Historic Site
Kent Whitworth, Director and CEO, Minnesota Historical Society
Robert Larsen, Chair, Minnesota Indian Affairs Council
Shannon Geshick, Executive Director, Minnesota Indian Affairs Council
Sarah Beimers, Minnesota State Historic Preservation Office
Brenna Gunderson, Apex Clean Energy, Director of Project Development
Jennie Geiger, Apex Clean Energy, Sr. Environmental Permitting Manager
Tom Sanders, Red Rock Ridge Research Group
Cheyanne St. John, Tribal Historic Preservation Officer, Lower Sioux Indian Community
Samantha Odegard, Tribal Historic Preservation Officer, Upper Sioux Indian Community
Leonard Wabasha, Director of Cultural Resources, Mdewakanton Sioux Community
Noah White, Tribal Historic Preservation Officer, Prairie Island Indian Community
Terry Kemper, Interim Tribal Historic Preservation Officer, Mille Lacs Band of Ojibwe
Kade Ferris, Tribal Historic Preservation Officer, Red Lake Band of Chippewa Indians
Jamie Arsenaault, Tribal Historic Preservation Officer, White Earth Nation
Mary Ann Gagnon, Tribal Historic Preservation Officer, Grand Portage Band of Ojibwe
Amy Burnette, Tribal Historic Preservation Officer, Leech Lake Band of Ojibwe
Jill Hoppe, Tribal Historic Preservation Officer, Fond du Lac Band of Lake Superior Chippewa
Jaylen Strong, Tribal Historic Preservation Officer, Bois Forte Band of Chippewa
Amy Spong, Minnesota State Historic Preservation Office

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
FOR MINNESOTA POLLUTION CONTROL AGENCY

*In the Matter of the Application of Big
Bend Wind, LLC for a Certificate of
Need, Site Permit, and Route Permit for
an up to 308 MW Wind Farm and
Associated 161 kV Transmission Line in
Cottonwood, Martin, and Watonwan
Counties, Minnesota*

MPUC Docket No. IP-7013/CN-19-408

MPUC Docket No. IP-7013/WS 19-619
OAH Docket No. 60-2500-37376

MPUC Docket No. IP-7013/TL-19-621

CERTIFICATE OF SERVICE

Theresa A. Senart certifies that on the 29th day of April, 2021, she filed a true and correct copy of **Comments on the Scope of Environmental Review for the Big Ben Wind Project** on behalf of Minnesota Historical Society by posting the same on www.edockets.state.mn.us. Said Comments letter has also been served via U.S. Mail or e-mail as designated on the attached Official Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

s/ Theresa A. Senart
Theresa A. Senart

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_19-408_19-408
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
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_19-408_19-408
Annie	Felix Gerth	annie.felix-gerth@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_19-408_19-408
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_19-408_19-408
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_19-408_19-408
Brenna	Gunderson	Brenna.gunderson@apexcleanenergy.com	Apex Clean Eenergy	8665 Hudson Blvd N Ste 110 Lake Elmo, MN 55042	Electronic Service	Yes	OFF_SL_19-408_19-408
Kate M	Heins	kate.heins@apexcleanenergy.com	Apex Clean Energy	310 4th St NE Ste 200 Charlottesville, VA 22902	Electronic Service	Yes	OFF_SL_19-408_19-408
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-408_19-408
Dylan	Ikkala	dylan.ikkala@apexcleanenergy.com	Apex Clean Energy	8665 Hudson Blvd N Ste 110 Lake Elmo, MN 55042	Electronic Service	Yes	OFF_SL_19-408_19-408

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Amy	Kania	akania@hogenadams.com	Hogen Adams PLLC	1935 County Road B2 West Suite 460 St. Paul, MN	Electronic Service	No	OFF_SL_19-408_19-408
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-408_19-408
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_19-408_19-408
Chris	Kunkle	chris.kunkle@apexcleanenergy.com	Apex Clean Energy	8665 Hudson Blvd North, Suite 110 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-408_19-408
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_19-408_19-408
Kevin	Majjala	Kevin.Majjala@mnhs.org	Minnesota Historical Society	N/A	Electronic Service	No	OFF_SL_19-408_19-408
Susan	Medhaug	Susan.medhaug@state.mn.us	Department of Commerce	Suite 280, 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_19-408_19-408
Samantha J	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_19-408_19-408
Peter	Rademacher	prademacher@hogenadams.com		1935 County Road B2 West Suite 460 St. Paul, Minnesota 55113	Electronic Service	No	OFF_SL_19-408_19-408
Leif	Rasmussen	leif@staffensandrasmussen.com	Staffens & Rasmussen	6600 France Ave South Edina, MN 55435	Electronic Service	No	OFF_SL_19-408_19-408

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_19-408_19-408
Ronald C	Schirmer	ronald.schirmer@mnsu.edu	Department of Anthropology	359 Trafton Science Center N Mankato, MN 56001	Electronic Service	No	OFF_SL_19-408_19-408
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-408_19-408
Cheyenne	St. John	cheyenne.stjohn@lowersioux.com	Lower Sioux Tribal Community	39527 Reservation Hwy 1 Morton, MN 56270	Electronic Service	No	OFF_SL_19-408_19-408
Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-408_19-408
Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Box 25 St. Paul, Minnesota 55155-4040	Electronic Service	No	OFF_SL_19-408_19-408

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Majjala	Kevin.Majjala@mnhs.org	Minnesota Historical Society	N/A	Electronic Service	No	OFF_SL_19-619_19-619
Samantha J	Odegard	samanthao@uppersiouxcommunity-nsn.gov	Upper Sioux Tribal Community	PO Box 147 Granite Falls, MN 56241	Electronic Service	No	OFF_SL_19-619_19-619
Peter	Rademacher	prademacher@hogenadams.com		1935 County Road B2 West Suite 460 St. Paul, Minnesota 55113	Electronic Service	No	OFF_SL_19-619_19-619
Leif	Rasmussen	leif@staffensandrasmusse n.com	Staffens & Rasmussen	6600 France Ave South Edina, MN 55435	Electronic Service	No	OFF_SL_19-619_19-619
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_19-619_19-619
Ronald C	Schirmer	ronald.schirmer@mnsu.edu	Department of Anthropology	359 Trafton Science Center N Mankato, MN 56001	Electronic Service	No	OFF_SL_19-619_19-619
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-619_19-619
Cheyenne	St. John	cheyenne.stjohn@lowersioux.com	Lower Sioux Tribal Community	39527 Reservation Hwy 1 Morton, MN 56270	Electronic Service	No	OFF_SL_19-619_19-619
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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 Eenrgy	8665 Hudson Blvd N Ste 110 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-621_19-621
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