Executed Petitions

Petitioners' Representative: Carol A. Overland, Attorney for Association of Freeborn County Landowners (AFCL) 1110 West Avenue, Red Wing, MN 55066 overland@legalectric.org

We, the undersigned, under Minn. R. 4410.1100, Subp. 3(b), Petition the Environmental Quality Board, and ask that a Discretionary Environmental Assessment Worksheet (Minn, R, 4410.4500) be completed regarding Freeborn Wind, LLC, a "project" as defined by Minn, R, 4410.0200, Subp. 58. The Freeborn Wind project is not exempted under Minn, R. 4410.4600. As an electric generating facility over 50 MW, a mandatory EAW and EIS is required. Minn, R. 4410.4300 and Minn, R. 4100.4400. Minn, Stat \$216F.05(4) mandated adoption of rules for Large Wind Energy Conversion Systems (LWECS) including "requirements for environmental review of the LWECS," but no requirements FOR environmental review of LWECS were adopted. Wind projects have historically evaded and avoided environmental review. Minn. R. 7854.0500, Subp. 7 details application requirements: "The analysis of the environmental impacts required by this subpart satisfies the environmental review requirements of chapter 4410, parts 7849.1000 to 7849.2100, and Manneso ta Statutes, chapter 116D. No environmental assessment work heet or environmental impact statement shall be required on a proposed LWECS project." An application is not environmental review or Alternative Review under Minn, Stat. §116D.04, Subd. 4a; Minn, R. 4410,3600, Subp. 1 or 2. Under MEPA, the Commission must consider environmental consequences when deciding whether to issue a permit. Id., see also In the Matter of Manesona Power's Petition by Approval of the EnergyForward Resource PacMage, p. 5-6, A19-0688, A19-0704, PUC Docket E015/AI-17-568 (December 23, 2019). Information provided by applicant does not constitute environmental review under MEPA. An EAW is essential, and this Petition is filed at this late stage because AFCL's Motion/Petition for EIS (motion practice, not a Minn, R. 4410 Petition) was denied December 19, 2019. There are no LWECS siting rules and no LWECS-specific siting standards, only small wind standards. The Commission has also disregarded the public process mandate of the Power Plant Siting Act, Minn, Stat. §216E.08. There has been no public hearing or contested case regarding the voluminous Xcel Energy application (8/20/2019) and compliance filings (11/8/2019 and 12/6/2019) proposing larger. noisier turbines, in particular no public process regarding new noise modeling using a 0.5 ground factor input after prior modeling with 0.0 ground factor could not demonstrate compliance with state noise standards. The Commission has notice that use of 0.5 ground factor is not appropriate for modeling noise, which raises questions of likely compliance with MPCA's noise standard (Minn. R. 7030.0400). New shadow flicker modeling shows 6 or more homes receiving over 30 hours annually. Other environmental impacts are addressed in supporting material evidence, attached. Environmental review is required by MEPA, Minn. Stat. §116D.03, Subd. 2; Minn. Stat. \$116D.04, Subd. 2a. The Freeborn project, presents substantive environmental impacts, including noise and shadow flicker, aesthetic and visual, wildlife, and socioeconomic impacts of decreased property marketability and valuation. All governmental permits have not yet been granted. Minn. R. 4410.4600, Subp. 2(B). The PUC has deliberated and made its decision and as of 12/24/2019 the Order has not been eFiled. Some of the permits not yet granted include Township OS & OW permits; County Utility Permit, County Access Permit, See permit list, App. p. 111-113 (20176-132804-01). Construction may not begin and additional permits may not be issued until the issues raised by this Petition have been settled. Minn. R. 4410.3100, Subp. 1. This Petition and supporting material evidence demonstrates that because of the nature and location of the project there is potential for significant environmental effects. We the undersigned ask that the EQB refer this Petition and supporting material evidence to the Public Utilities Commission as RGU and that an EAW be completed to determine whether an Environmental Impact Statement is necessary.

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ceci Joppson	Collin, Johnson	\$1310 MOST GIENVILLE MN 56036
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Karen Hansen!	Karen Hansen	86472 145th St. Glenuile MN 56036
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John Szyrach	JOHN SZYMECZER	12742 850 MAVE GLENVILLE, MN 56036

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Petitioners' Representative:

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Mille Molfe	Michelle Wolfe	9423 Lemonal Rd. Elkndole MN. 5602
Mapellalle	mike Wolke	a423 Lemond Role Ellendale MIR 5100 212
Lea Buches	L'isa Bucher	11414 730th St. Bleoming Prane, MIN 55917
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Petitioners' Representative:

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Enjs & Homberg	Erin L. Hornberger	87340 135th St. Glenville, MN 56036
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	*)	

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We, the undersigned, under Minn. R. 4410.1100, Subp. 3(b), Petition the Environmental Quality Board, and ask that a Discretionary Environmental Assessment Worksheet (Minn, R. 4410.4500) be completed regarding Freeborn Wind, LLC, a "project" as defined by Minn, R. 4410.0200, Subp. 58. The Freeborn Wind project is not exempted under Minn, R. 4410.4600. As an electric generating facility over 50 MW, a mandatory EAW and EIS is required. Minn. R. 4410.4300 and Minn. R. 4100.4400. Minn. Stat §216F.05(4) mandated adoption of rules for Large Wind Energy Conversion Systems (LWECS) including "requirements for environmental review of the LWECS," but no requirements FOR environmental review of LWECS were adopted. Wind projects have historically evaded and avoided environmental review, Minn, R. 7854.0500, Subp. 7 details application requirements: "The analysis of the environmental impacts required by this subpart satisfies the environmental review requirements of chapter 4410, parts 7849,1000 to 7849,2100, and Minnesota Statutes, chapter 116D. No environmental assessment worksheet or environmental impact statement shall be required on a proposed LWECS project." An application is not environmental review or Alternative Review under Minn. Stat. §116D.04, Subd. 4a; Minn. R. 4410.3600, Subp. 1 or 2. Under MEPA, the Commission must consider environmental consequences when deciding whether to issue a permit. Id., see also In the Matter of Minnesota Power's Petition for Approval of the EnergyForward Resource Package, p. 5-6, A19-0688, A19-0704, PUC Docket E015/AI-17-568 (December 23, 2019). Information provided by applicant does not constitute environmental review under MEPA. An EAW is essential, and this Petition is filed at this late stage because AFCL's Motion/Petition for EIS (motion practice, not a Minn. R. 4410 Petition) was denied December 19, 2019. There are no LWECS siting rules and no LWECS-specific siting standards, only small wind standards. The Commission has also disregarded the public process mandate of the Power Plant Siting Act. Minn. Stat. §216E.08. There has been no public hearing or contested case regarding the voluminous Xcel Energy application (8/20/2019) and compliance filings (11/8/2019 and 12/6/2019) proposing larger, noisier turbines, in particular no public process regarding new noise modeling using a 0.5 ground factor input after prior modeling with 0.0 ground factor could not demonstrate compliance with state noise standards. The Commission has notice that use of 0.5 ground factor is not appropriate for modeling noise, which raises questions of likely compliance with MPCA's noise standard (Minn. R. 7030.0400). New shadow flicker modeling shows 6 or more homes receiving over 30 hours annually. Other environmental impacts are addressed in supporting material evidence, attached. Environmental review is required by MEPA. Minn. Stat. §116D.03, Subd. 2; Minn. Stat. \$116D.04, Subd. 2a. The Freeborn project, presents substantive environmental impacts, including noise and shadow flicker, aesthetic and visual, wildlife, and socioeconomic impacts of decreased property marketability and valuation. All governmental permits have not yet been granted. Minn. R. 4410.4600, Subp. 2(B). The PUC has deliberated and made its decision and as of 12/24/2019 the Order has not been eFiled. Some of the permits not yet granted include Township OS & OW permits; County Utility Permit, County Access Permit. See permit list, App. p. 111-113 (20176-132804-01). Construction may not begin and additional permits may not be issued until the issues raised by this Petition have been settled. Minn. R. 4410.3100, Subp. 1. This Petition and supporting material evidence demonstrates that because of the nature and location of the project there is potential for significant environmental effects. We the undersigned ask that the EQB refer this Petition and supporting material evidence to the Public Utilities Commission as RGU and that an EAW be completed to determine whether an Environmental Impact Statement is necessary.

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le-3626	David Overland	2024 Capital Ln. Albert Lea Mn. 56007
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Harmanders	SHARON M. DAVIS	87002 State Lie Rd Genille, MN 56036
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lovel	Jug Wille 57	1301 Fronk Anna AL MUSGOT
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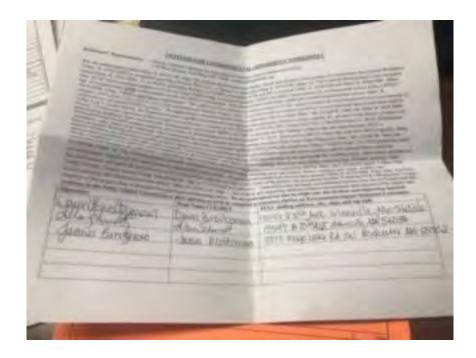
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menny gring		1

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Cheviz Bohenelz	-Travis Behrends	78739 320th Ave Worthington MNS6187



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Mul 14 annen	Merle JANSSEN	33532 770th Street Worthington MN 56187
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Andi M Rosinguist	Kristi Rosienquist	42883 228th Avenue, Mazeppa, MN 55956
Deb Rang	Bob Rosenquist	42883 228th Avenue, Mazeppa, MN 55952

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how Ha	Ryan Hajel	81638 150th St Colenville, MN Sou36
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Kunt P Damber	KURT P. HAMBERG	7641 Alden Way NE, Fridley, MN 55432 7641 ALDEN WAY NE FRIDLEY MM	55432
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Brue M' Namaro	Bruce McNamara	35815 165 th Ave. 11 11 11
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Kevin Wenninger	Kevin Wenninger.	29770 State Hwy 15 Winthrop, MN 55396
Barb-Wenninger	Barb Wenningen	29770 State Hwy 15 Winthrop, MN5539
	Morgan Wenninger	29770 State Hwy 15 WinthropMN 55396
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Land		

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We, the undersigned, under Minn, R. 4410.1100, Subp. 3(b), Petition the Environmental Quality Board, and ask that a Discretionary Environmental Assessment Worksheet (Minn, R. 4410.4500) be completed regarding Freeborn Wind, LLC, a "project" as defined by Minn, R. 4410.0200, Subp. 58. The Freeborn Wind project is not exempted under Minn, R. 4410.4600. As an electric generating facility over 50 MW, a mandatory EAW and EIS is required. Minn, R. 4410.4300 and Minn, R. 4100.4400. Minn, Stat §216F.05(4) mandated adoption of rules for Large Wind Energy Conversion Systems (LWECS) including "requirements for environmental review of the LWECS," but no requirements FOR environmental review of LWECS were adopted. Wind projects have historically evaded and avoided environmental review. Minn, R. 7854.0500, Subp. 7 details application requirements: "The analysis of the environmental impacts required by this subpart satisfies the environmental review requirements of chapter 4410, parts 7849,1000 to 7849,2100, and Minnesota Statutes, chapter 116D. No environmental assessment worksheet or environmental impact statement shall be required on a proposed LWECS project." An application is not environmental review or Alternative Review under Minn. Stat. \$116D.04, Subd. 4a; Minn. R. 4410.3600, Subp. 1 or 2. Under MEPA, the Commission must consider environmental consequences when deciding whether to issue a permit. Id., see also In the Matter of Minnesota Power's Petition for Approval of the EnergyForward Resource Package, p. 5-6, A19-0688, A19-0704, PUC Docket E015/AI-17-568 (December 23, 2019). Information provided by applicant does not constitute environmental review under MEPA. An EAW is essential, and this Petition is filed at this late stage because AFCL's Motion/Petition for EIS (motion practice, not a Minn, R, 4410 Petition) was denied December 19, 2019. There are no LWECS siting rules and no LWECS-specific siting standards, only small wind standards. The Commission has also disregarded the public process mandate of the Power Plant Siting Act. Minn. Stat. §216E.08. There has been no public hearing or contested case regarding the voluminous Xcel Energy application (8/20/2019) and compliance filings (11/8/2019 and 12/6/2019) proposing larger, noisier turbines, in particular no public process regarding new noise modeling using a 0.5 ground factor input after prior modeling with 0.0 ground factor could not demonstrate compliance with state noise standards. The Commission has notice that use of 0.5 ground factor is not appropriate for modeling noise, which raises questions of likely compliance with MPCA's noise standard (Minn. R. 7030.0400). New shadow flicker modeling shows 6 or more homes receiving over 30 hours annually. Other environmental impacts are addressed in supporting material evidence, attached. Environmental review is required by MEPA. Minn. Stat. \$116D.03, Subd. 2; Minn. Stat. \$116D.04, Subd. 2a. The Freeborn project, presents substantive environmental impacts, including noise and shadow flicker, aesthetic and visual, wildlife, and socioeconomic impacts of decreased property marketability and valuation. All governmental permits have not yet been granted. Minn. R. 4410.4600, Subp. 2(B). The PUC has deliberated and made its decision and as of 12/24/2019 the Order has not been eFiled. Some of the permits not yet granted include Township OS & OW permits; County Utility Permit, County Access Permit. See permit list, App. p. 111-113 (20176-132804-01). Construction may not begin and additional permits may not be issued until the issues raised by this Petition have been settled. Minn. R. 4410.3100, Subp. 1. This Petition and supporting material evidence demonstrates that because of the nature and location of the project there is potential for significant environmental effects. We the undersigned ask that the EOB refer this Petition and supporting material evidence to the Public Utilities Commission as RGU and that an EAW be completed to determine whether an Environmental Impact Statement is necessary.

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the MAG	JOSH EllINGSON	502 GRALE 37 ALBERT LEA, MN. 56007
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Zestary Peter	Zachary Peterson	19492 650m Ave Alden MN 56007

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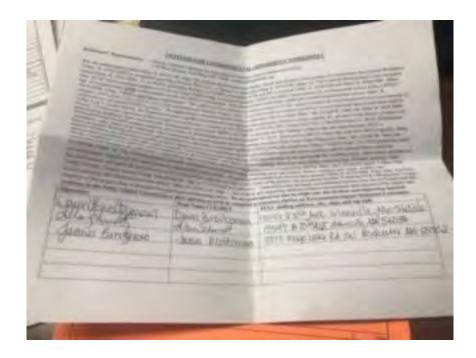
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Cheviz Bohendz	-Travis Behrends	78739 320th Ave Worthington MNS6187



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Deb Rang	Bob Rosenquist	42883 228th Avenue, Mazeppa, MN 55952

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We, the undersigned, under Minn. R. 4410.1100, Subp. 3(b), Petition the Environmental Quality Board, and ask that a Discretionary Environmental Assessment Worksheet (Minn. R. 4410.4500) be completed regarding Freeborn Wind, LLC, a "project" as defined by Minn. R. 4410.0200, Subp. 58. The Freeborn Wind project is not exempted under Minn. R. 4410.4600. As an electric generating facility over 50 MW, a mandatory EAW and EIS is required. Minn. R. 4410.4300 and Minn. R. 4100.4400. Minn. Stat §216F.05(4) mandated adoption of rules for Large Wind Energy Conversion Systems (LWECS) including "requirements for environmental review of the LWECS," but no requirements FOR environmental review of LWECS were adopted. Wind projects have historically evaded and avoided environmental review. Minn, R. 7854.0500, Subp. 7 details application requirements: "The analysis of the environmental impacts required by this subpart satisfies the environmental review requirements of chapter 4410, parts 7849.1000 to 7849.2100, and Minnesota Statutes, chapter 116D. No environmental assessment worksheet or environmental impact statement shall be required on a proposed LWECS project." An application is not environmental review or Alternative Review under Minn. Stat. §116D.04, Subd. 4a; Minn. R. 4410.3600. Subp. 1 or 2. Under MEPA, the Commission must consider environmental consequences when deciding whether to issue a permit. Id., see also In the Matter of Minnesota Power's Petition for Approval of the EnergyForward Resource Package, p. 5-6, A19-0688, A19-0704, PUC Docket E015/AI-17-568 (December 23, 2019). Information provided by applicant does not constitute environmental review under MEPA. An EAW is essential, and this Petition is filed at this late stage because AFCL's Motion/Petition for EIS (motion practice, not a Minn. R. 4410 Petition) was denied December 19, 2019. There are no LWECS siting rules and no LWECS-specific siting standards, only small wind standards. The Commission has also disregarded the public process mandate of the Power Plant Siting Act. Minn. Stat. §216E.08. There has been no public hearing or contested case regarding the voluminous Xcel Energy application (8/20/2019) and compliance filings (11/8/2019 and 12/6/2019) proposing larger, noisier turbines, in particular no public process regarding new noise modeling using a 0.5 ground factor input after prior modeling with 0.0 ground factor could not demonstrate compliance with state noise standards. The Commission has notice that use of 0.5 ground factor is not appropriate for modeling noise, which raises questions of likely compliance with MPCA's noise standard (Minn. R. 7030.0400). New shadow flicker modeling shows 6 or more homes receiving over 30 hours annually. Other environmental impacts are addressed in supporting material evidence, attached, Environmental review is required by MEPA, Minn, Stat, \$116D.03, Subd. 2: Minn, Stat. \$116D.04, Subd. 2a. The Freeborn project, presents substantive environmental impacts, including noise and shadow flicker, aesthetic and visual, wildlife, and socioeconomic impacts of decreased property marketability and valuation. All governmental permits have not yet been granted. Minn. R. 4410,4600, Subp. 2(B). The PUC has deliberated and made its decision and as of 12/24/2019 the Order has not been eFiled. Some of the permits not yet granted include Township OS & OW permits; County Utility Permit, County Access Permit. See permit list, App. p. 111-113 (20176-132804-01). Construction may not begin and additional permits may not be issued until the issues raised by this Petition have been settled. Minn. R. 4410.3100, Subp. 1. This Petition and supporting material evidence demonstrates that because of the nature and location of the project there is potential for significant environmental effects. We the undersigned ask that the EQB refer this Petition and supporting material evidence to the Public Utilities Commission as RGU and that an EAW be completed to determine whether an Environmental Impact Statement is necessary.

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Sandischer	SAND, FISCHER	8727 Lincoln STNE Blains MN 55434
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Ranicl Eck alman	Dynjel Eck	17215 211th Ave NW Bis Lyte My 5530
Patti Myers	Patti Myers	401 N 13th Ave. PRINceton MN. 55371

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Ceith beach	Keith Goodin	4863 Stonenidge Dr. Monticello MN 55362

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Barb-Wenninger	Barb Wenningen	29770 State Hwy 15 Winthrop, MN5539
	Morgan Wenninger	29770 State Hwy 15 WinthropMN 55396
	J. J.	

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We, the undersigned, under Minn. R. 4410.1100, Subp. 3(b), Petition the Environmental Quality Board, and ask that a Discretionary Environmental Assessment Worksheet (Minn, R. 4410,4500) be completed regarding Freeborn Wind, LLC, a "project" as defined by Minn, R. 4410,0200, Subp. 58. The Freeborn Wind project is not exempted under Minn, R. 4410.4600. As an electric generating facility over 50 MW, a mandatory EAW and EIS is required. Minn. R. 4410.4300 and Minn. R. 4100.4400. Minn. Stat §216F.05(4) mandated adoption of rules for Large Wind Energy Conversion Systems (LWECS) including "requirements for environmental review of the LWECS." but no requirements FOR environmental review of LWECS were adopted. Wind projects have historically evaded and avoided environmental review. Minn, R, 7854.0500, Subp. 7 details application requirements: "The analysis of the environmental impacts required by this subpart satisfies the environmental review requirements of chapter 4410, parts 7849,1000 to 7849,2100, and Minnesota Statutes, chapter 116D. No environmental assessment worksheet or environmental impact statement shall be required on a proposed LWECS project." An application is not environmental review or Alternative Review under Minn. Stat. §116D.04, Subd. 4a; Minn. R. 4410.3600, Subp. 1 or 2. Under MEPA, the Commission must consider environmental consequences when deciding whether to issue a permit. Id., see also In the Matter of Minnesota Power's Petition for Approval of the EnergyForward Resource Package, p. 5-6, A19-0688, A19-0704, PUC Docket E015/AI-17-568 (December 23, 2019). Information provided by applicant does not constitute environmental review under MEPA. An EAW is essential, and this Petition is filed at this late stage because AFCL's Motion/Petition for EIS (motion practice, not a Minn. R. 4410 Petition) was denied December 19, 2019. There are no LWECS siting rules and no LWECS-specific siting standards, only small wind standards. The Commission has also disregarded the public process mandate of the Power Plant Siting Act. Minn. Stat. §216E.08. There has been no public hearing or contested case regarding the voluminous Xcel Energy application (8/20/2019) and compliance filings (11/8/2019 and 12/6/2019) proposing larger, noisier turbines, in particular no public process regarding new noise modeling using a 0.5 ground factor input after prior modeling with 0.0 ground factor could not demonstrate compliance with state noise standards. The Commission has notice that use of 0.5 ground factor is not appropriate for modeling noise, which raises questions of likely compliance with MPCA's noise standard (Minn. R. 7030.0400). New shadow flicker modeling shows 6 or more homes receiving over 30 hours annually. Other environmental impacts are addressed in supporting material evidence, attached. Environmental review is required by MEPA. Minn. Stat. §116D.03. Subd. 2; Minn. Stat. \$116D.04, Subd. 2a. The Freeborn project, presents substantive environmental impacts, including noise and shadow flicker, aesthetic and visual, wildlife, and socioeconomic impacts of decreased property marketability and valuation. All governmental permits have not yet been granted. Minn. R. 4410.4600, Subp. 2(B). The PUC has deliberated and made its decision and as of 12/24/2019 the Order has not been eFiled. Some of the permits not yet granted include Township OS & OW permits; County Utility Permit, County Access Permit. See permit list, App. p. 111-113 (20176-132804-01). Construction may not begin and additional permits may not be issued until the issues raised by this Petition have been settled. Minn. R. 4410.3100, Subp. 1. This Petition and supporting material evidence demonstrates that because of the nature and location of the project there is potential for significant environmental effects. We the undersigned ask that the EQB refer this Petition and supporting material evidence to the Public Utilities Commission as RGU and that an EAW be completed to determine whether an Environmental Impact Statement is necessary

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