

BEFORE
THE NATIONAL AERONAUTICS AND SPACE ADMINISTRATION

Federal Register Docket No. 2010-21052, Notice 10-093

*National Environmental Policy Act;
NASA Glenn Research Center Plum Brook Station
Wind Farm Project*

COMMENTS
SUBMITTED ON BEHALF OF THE STAFF OF
THE OHIO POWER SITING BOARD
ON PROPOSED ENVIRONMENTAL IMPACT STATEMENT
SCOPING FOR THE NASA GLENN RESEARCH CENTER

October 22, 2010

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In Ohio, the Ohio Power Siting Board (OPSB) has regulatory jurisdiction for approving the construction of “major utility facilities”. A “major utility facility”, as defined by Section 4906.01, Ohio Revised Code, includes “electric generating plant and associated facilities designed for, or capable of, operation at a capacity of fifty megawatts or more.” In addition, the OPSB has jurisdiction over “economically significant wind farms,” defined as follows:

... wind turbines and associated facilities with a single inter-connection to the electrical grid and designed for, or capable of, operation at an aggregate capacity of five or more megawatts but less than fifty megawatts.¹

It is with this background that the OPSB Staff submits comments pertaining to the EIS scoping efforts for the NASA Glenn Research Center Plum Brook Station Wind Farm, noticed in the Federal Register on August 25, 2010 (p. 52374 – 52375).

According to the Supplementary Information in the Federal Register, the potential wind farm project would consist of 20 to 30 wind turbines, with a rated capacity of 2.5 megawatts (MW) each, and a total maximum project capacity of 70 MW.

¹ Ohio Rev. Code Ann. § 4906.13(A) (West 2010).

The Federal Register directs that, “[w]ritten comments, statements, and or questions regarding the alternatives or environmental impacts should identify issues or suggest topics to be included in this EIS.”² The Staff of the OPSB offers the following comments consistent with that direction.

For the proposed wind turbines, electric collection system, access roads, and other facilities associated with the potential Plum Brook Station Wind Farm, OPSB Staff recommends that the EIS consider, at minimum, the following factors:

- Temporary and permanent impacts to surface waters (i.e., wetlands, streams, etc)
- Direct and indirect impacts to wildlife
- Potential impacts to cultural resources, including both archaeological and architectural resources
- Site geology
- Noise – during both construction and operation
- Visual impact (i.e., aesthetics)
- Shadow flicker
- Communication interference
- Radar interference
- Ice throw
- Blade shear
- Decommissioning
- Impacts to regional electric power grid

² August 25, 2010 Federal Register, p. 52375

- Impacts to roads and bridges from construction/equipment delivery
- Impacts to agricultural production (if applicable)
- Land use impacts
- Impacts to aviation
- Setbacks, from both project property lines and sensitive receptors

Staff notes that the aforementioned list is not exclusive, and would encourage consideration of other factors that may not have been mentioned, in the EIS.


Staff notes that the Federal Register includes a reference to OPSB setbacks.³ Section 4906.20(B)(2), Ohio Revised Code, discusses such applicable minimum setbacks.

Staff further recommends that the EIS consider the potential worst-case scenario for all of the variables within its scope of analysis so that the EIS results are robust and meaningful. This would include, for instance, consideration of the tallest potential turbine models when evaluating shadow flicker, as well as the loudest turbine models under potential consideration when evaluating operational noise impacts. If the impacts under the worst-case scenario are deemed reasonable after any appropriate avoidance and/or mitigation, then any deviation from those initial assumptions implicit in the worst-case scenario will only result in a beneficial reduction of potential impacts associated with the project. Changes in this direction will be easier to incorporate during the review stage, as opposed to changes in which the impacts are subsequently expected to be greater than that assessed in the EIS.

³ August 25, 2010 Federal Register, p. 52375

Staff appreciates the opportunity to comment at this early stage in the process, and requests that OPSB Staff be added to the distribution list for the EIS.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stuart M. Siegfried". The signature is fluid and cursive, with a large, stylized "S" at the end.

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Summary: Comments submitted to the National Aeronautics and Space Administration according to Federal Register Docket No. 2010-21052, Notice 10-093, on behalf of the Staff of the Ohio Power Siting Board on Proposed Environmental Impact Statement Scoping for the NASA Glenn Research Center electronically filed by Kimberly L Keeton on behalf of Ohio Power Siting Board