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16-1871-EL-BGN

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To:

Ohio Power Siting Board

Permit Application for #16-1871-EL-BGN: Icebreaker Wind Facility, Lake Erie

Public Comments

Please find a four page critical letter of a proposed Lake Erie offshore industrial wind turbine project by Dr. Scott A. Petrie, Executive Director of Long Point Waterfowl. Long Point Waterfowl is located in Port Rowan, Ontario on the north shore of Lake Erie. Dr. Petrie commented on Environmental Screening Report for the proposed offshore SouthPoint wind project. He wrote about the hundreds of thousands of waterbirds that migrate across and along the shoreline of Lake Erie. He is an expert on waterfowl migration in Lake Erie. The Ontario issued a moratorium on wind turbine energy development in the Great Lakes bordering the Province in 2012. The reasons for the moratorium were the need for scientific, independent environmental studies and also because the proposed electricity costs would have been prohibitive for electric ratepayers.

On page three Dr. Petrie wrote the following:

"Based on these methodological deficiencies, and annual and seasonal variation in waterbird migration, I suggest that 3 years of spring, fall, and winter pre-construction monitoring (aerial surveys and radar) are necessary. This should include one aerial survey per week between 1 Sep and 1 May and intensive radar surveys throughout spring and fall migration."

I recommend the staff of the OPSB contact Dr. Petrie to obtain any studies he has conducted of waterfowl movement in Lake Erie and to find out what he thinks of the Icebreaker project and how it would affect birds migrating over Lake Erie.

Thank You

Tom Wasilewski

8/4/17

Tom Wasilewski

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Waterfowl & Wetland Research, Education & Conservation in the Great Lakes Region

1 October, 2009

Jim Lovas, President
SouthPoint Wind
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Leamington, ON
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Dear Sir,

I am writing you to express my concerns with numerous aspects of the Environmental Screening Report (ESR) for the proposed SouthPoint Wind Farm Project on Lake Erie. I am the Executive Director of Long Point Waterfowl and am an Adjunct Professor at the University of Western Ontario where I teach Wildlife Ecology and Management. Long Point Waterfowl is a non-government organization that is committed to waterfowl and wetland research, education and conservation in the Great Lakes region.

My primary concern with the proposed SouthPoint Wind Farm relate to the hundreds of thousands of waterbirds that migrate across and along the shoreline of Lake Erie during spring and fall and the possibility that the proposed development with displace birds from important migratory corridors and/or traditional staging/feeding areas. There are many critical and invalid assumptions within the ESR and the waterfowl monitoring methodology is seriously flawed and lacks scientific rigor. Although I have not had time to read through the entire report (> 500 pages), I have listed a number of key concerns below:

1/ Pigeon Bay is far too big to adequately survey from shore (particularly since surveys were only conducted from 2 locations) due to the fact that waves make it impossible to adequately count birds at distances and that seaducks and diving ducks regularly roost 3-10 km offshore (Long Point Waterfowl data).

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2/ I suspect that the spring surveys were started too late to detect the initiation and possibly even the peak of seaduck and diving duck migration as it generally starts about 1 March.

3/ Shoreline surveys continued until 27 April and a complete "nautical" survey was not conducted until May 5th. Lake Erie is used extensively by staging waterfowl and most spring migrants have departed the region by mid-April. Consequently, by the time the "nautical" surveys were initiated most migrating waterfowl would have left Pigeon Bay.

4/ Conducting waterfowl surveys by boat is also inadequate as birds easily become disturbed (fly or dive) and it is difficult to estimate numbers of rafted birds, particularly when it is wavy. Furthermore, an insufficient number (and length) of transects were monitored to provide a reliable estimate of waterfowl numbers or distributions within the study area.

5/ It is standard practice to use aircraft to count waterfowl on large waterbodies, particularly when seaducks and diving ducks numbers are being estimated, as they have a tendency to loaf up to 10 km offshore (Long Point Waterfowl data). Further, it is very difficult to estimate concentrations of waterfowl unless biologists are counting birds from the air.

Based on these and the aforementioned methodological inadequacies, the authors are not justified or qualified to make the following Executive Summary statement "surveys of the study area during migration confirmed that waterfowl, waterbirds, and other diurnal migrants use the area for staging, though these did not have any particular concentration in any given area of this large, featureless bay"

6/ Relative to Europe and the United States, there has been insufficient pre-construction monitoring at most proposed/developed wind turbine sites in Ontario (days/months as opposed to years). The current proposal suffers the same deficiency as it includes monitoring during only one spring season. Further, the report was released and public comments were required before any fall or winter survey data will be made available. Based on the fact that timing of migration, bird numbers, and habitat selection can vary substantially from year to year, one season of surveys is quite clearly inadequate. Aerial surveys should be conducted under an array of weather conditions during 3 spring, fall and winter seasons.

7/ On page 282 the ESR states that “During the fall, high concentrations of birds occur near Pelee Island, Point Pelee, Rondeau, and Long Point. Birds to the east of the SouthPoint Wind Project, are likely taking off from the Point and flying straight southward, a direction that does not take them across any of the SouthPoint Wind Project sites.” SouthPoint has absolutely no basis for such a statement and had they done an adequate assessment of published literature and available data they would realize that there is in fact a major east-west waterfowl migratory corridor along the north shore of Lake Erie between Long Point and the Detroit River (see <http://www.bsc-eoc.org/research/lpwwrf/index.jsp?lang=EN&targetpg=lpwwrfTUSWtrack> and <http://www.bsc-eoc.org/research/lpwwrf/index.jsp?lang=EN&targetpg=lpwwrfscaptracker>).

Therefore, the geographic location of the proposed development is directly in line with what could be considered the most important waterfowl migration corridor associated with the Canadian side of the lower Great Lakes.

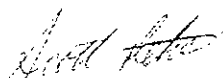
8/ Waterfowl generally migrate at night and they also make dawn and dusk movements to foraging (aquatic or terrestrial depending on species) areas. Based on the fact that the proposed development is adjacent to the Point Pelee National Park and is on a major waterfowl migration corridor, radar studies should be utilized to monitor the crepuscular and nocturnal movements/pathways of waterfowl and other bird species.

9/ It is stated within the ESR that, “Overall conclusions drawn from research in Denmark indicate that most birds start to divert their flight paths up to 3km away in daytime and within 1 km at night, showing marked flight deviations to fly around the turbine cluster.” The ESR then states that “the proposed wind farms have the potential to take up a small amount of space which may otherwise have been used for feeding during waterfowl staging.” Based on the results of rigorous Danish studies, we should in fact expect that a Pigeon Bay development will impact a major migratory corridor and will also “take up” a large amount of space that may otherwise have been used for feeding during waterfowl staging.

Based on these methodological deficiencies, and annual and seasonal variation in waterbird migration, I suggest that 3 years of spring, fall and winter pre-construction monitoring (aerial surveys and radar) are necessary. This should include one aerial survey per week between 1 Sep and 1 May and intensive radar surveys throughout spring and fall migration.

Based on the importance of this region for migratory waterbirds, the lack of scientific rigor associated with the ESR, and uncertainties with respect to seasonal distributions, local habitat use and movements, it would be negligent to develop the SouthPoint Wind Farm project at this time. I suggest that the Ministry should elevate the project to an Environmental Review or an Individual Environmental Assessment. As this could become the first offshore wind development on the Great Lakes, it is imperative that SouthPoint Wind employ adequate scientific rigor and assessment such that this and any subsequent developments are as environmentally friendly as possible.

Scott Petrie



cc Director of Environmental Assessment and Approvals Branch, Ministry of the Environment

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