

From: [Butler, Matthew](#)
To: [Puco Docketing](#)
Subject: public comment 16 1871 EI BGN
Date: Tuesday, May 19, 2020 9:46:05 AM
Attachments: [letter to opsb napaw may 18 2020 \(1\).pdf](#)

From: Sherri Lange <kodaisl@rogers.com>

Sent: Tuesday, May 19, 2020 9:43 AM

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Subject: RE additional comments LEEDCo/Icebreaker Case 16 1871 EI BGN

Dear Mr. Butler, Governor DeWine, Dan McCarthy, Chair of the Board, Sam Randazzo, and voting members of the OPSB.

Please review our additional comments with respect to endangered bats in Ohio, and the other species at risk of harm, with the possible placement of any offshore wind turbines near Cleveland. The letter is packed with information, that hopefully will assist in understanding the risks to species, such as the Indiana Bat, which cannot take on any more losses. Indeed, the losses of bat species world wide are so grievous that many are now speaking of entire gene pool demolition. The number one cause of bat deaths world wide is no longer White Nose Syndrome: it is industrial wind turbines.

Bats are largely responsible for the propagation of our rain forests, and a massive contributor to insect and disease control.

Thank you kindly for your review.

Sincerely,

Sherri

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May 18, 2020

RE CASE 16 1871 EL BGN ICEBREAKER

Dear Mr. Butler, Governor DeWine, Chairman Randazzo, and voting members of the OPSB

Please accept our further comments.

The Fred Olsen Renewables INC./LEEDCo proposal is a profit driven “made in heaven for wind developers” dream. Lake Erie is not for sale. The proposed project has absolutely nothing to do with the common good, cleaner air, and jobs. Please return the lake bed lease to the Public Trust, and accept our thanks for refusing to grant a licence for tax grabs, and eco waste in fresh water, apparently with no decommissioning plan in view.

The inevitability of harm:

Increasingly, there is more information about the fragility of bat populations, and their unique impact from industrial wind worldwide. We hope you will continue to protect the bats and other flying creatures of Ohio, with baseline protection of Lake Erie, from wind development. Fred Olsen Renewables, as you are aware, is intent on a proliferation of turbines in Lake Erie, numbering by their own admission, upwards of 1400 on the US side alone. This six-turbine demonstration project cannot be seen as “just” this: *it is a footstep towards an industrialization of fresh water never before witnessed.*

With your good guidance and commitment to the well being of Ohio, we believe the best of the Lake will be preserved, water quality, wildlife, the abundance of the miracle of migration, bird watching industries, fishing, recreational and commercial, as well as water activities and the visual impact of beauty and power of the Lake, a major tourist attraction. ALL of these are important. **Cleveland** Lake-front State Park, Headlands Beach State Park and Natural Area, Magee Marsh (Warbler Capital of North America), Cleveland Lakefront Nature Preserve, Cleveland Metroparks, Cuyahoga Valley National Park, just some of the magnet bird life and birding treasures, the envy of so many urban centres.

Our most urgent mission is to preserve Nature, water quality for 11 million, and our endangered species, and their habitat.

Within the mixture of the abundant bird and bat life of the Cleveland area, are known endangered residents: one being the Indiana Bat. A single male Indiana Bat was captured in a mist net in Brecksville Reservation this past fall. The reservation is within the boundaries of the Cuyahoga Valley National Park. The presence of the bat requires modifications to park management. ["The Indiana Bat is one of 13 bat species in OHIO and has been confirmed as summering in 27 Ohio Counties."](#)

The short theme for this letter is to confirm the well-known fact that bats, some birds, insects such as the Monarch, do pass through and around rotor heights of wind turbines. It is more and more becoming apparent that industrial wind offshore is a complete hazard, and will and does kill, harm, maim, wildlife, much endangered. (The developer has repeatedly ascertained that birds and bats do not fly over the Lake.) The extent of these kills are not fully known, as developers do the "counting," and the actual kill rates are well hidden, disguised, and only recently becoming fully understood, as people extrapolate from other areas of the world the nature of the damage, much unrecoverable.

Short notes and international experience:

- We do not know the extent of the damage from offshore wind to migrating and shoreline birds and bats. They like all living things, are curious, and also forage on tree like structures.
- We know it is impossible to count as the species impacted, dead, cannot be routinely monitored, nor mitigated as they will be consumed by water and fish, or other larger birds of prey.
- [From one example that met a test in the courts:](#) "It is uncontroverted that wind turbines kill or injure bats in large numbers, and the Court has concluded, in this case, that there is a virtual certainty that construction and operation of the Beech Ridge Project will take endangered Indiana bats in violation of Section 9 of the ESA." Similarly, we can assume that the Icebreaker will with virtual certainty in construction and operation, take and or harm endangered species in violation of Section 9 of the ESA.
- ["Hambler"](#) cites some distressing statistics from sources around the world. Between 6-18 million birds and bats are killed by Spanish wind farms each year Hambler says, including 400 griffon

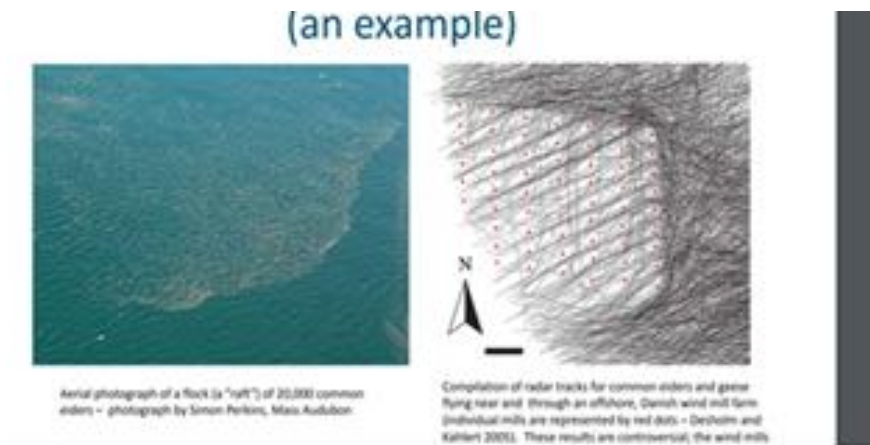
vultures per year just at Navarro. German wind turbines kill at least 200,000 bats per year, depressing populations up to 2,000 miles away. Wind turbines in the U.S. have been estimated to kill 70 bats per installed megawatt per year, on average, says Hambler. That would work out to about 320,000 bats per year in California.” (US annual bird and bat mortality, using Spanish wind turbine viable assessments/comparisons, compute to about 13-31 million per year.)

- [Thirteen years after a Swedish study, 2007](#), not much is being done to prevent the ongoing devastation to bat populations; “The study, which found no less than twelve species of bat in coastal areas or offshore, pointed out that if bat collisions occur with offshore turbines (as they do on land) “this is deplorable and it is a serious matter if this mortality lowers the density or wipes out local populations.”
- “Last year, [UK ecological consultancy company Baker Consultants](#), suggested that there is a shocking lack of knowledge over the effects of offshore wind development on bats. “*In our experience..*”, they [said](#), “*it is very rare that we are asked to consider bats in our approach to pre-construction surveys or impact assessments*”.
- “...[nobody can collect the dead bodies at sea](#). It is astonishing that the massive growth in offshore wind farms around the coasts of Britain and Europe has been permitted without any understanding of the effects this industrialisation of our seas may be having on bats, many of them rare and endangered species.”
- [Sweden: Vindval study](#): “Bats taking off, flyways and insect hunting The investigations in 2005 and 2006 could confirm that bats from Öland most often take off from at Eckelsudde and Ottenby. This was achieved by observing bats taking off from land and by observing migrating bats out at sea and by using automatic registration on the offshore windmills and also by the radar observations. In Öresund we also found that bats occurred all over the strait between Denmark and Sweden. Already in 2005 we discovered that **not only migrants but also nonmigratory species** occurred out over the sea, which in 2006 was confirmed as a regular phenomenon, in Kalmarsund as well as in Öresund. Of the 10 species observed out at sea we found that all of them hunted insects when they got the opportunity. It was often migrants that spent some time in an area with insect abundance and then went on in the same direction. However, we also observed that many bats regularly went out over the sea for hunting and then returned to land again”
- “[Where did the insects and other invertebrates come from?](#) It became quite obvious that the great amounts of prey organisms, flying, drifting and in the water surface, are an important food source for migrating bats and also for non-migratory species. Until now this was completely unknown. We also have 19 VINDVAL Report 5571 - Bats and offshore wind turbines evidence that offshore wind power turbines can be used by bats as roosts where they are near to rich feeding areas (more about that below). The question from where this food source is coming is complicated. We found that large amounts of the animals, e.g. chironomids, are produced in the sea. However there were also a lot of land insects drifting across the sea. At some occasions we observed insects in passive drift from east as air plankton. They moved in the direction of the east coast of Blekinge and as some of them were from terrestrial ecosystems, we assume they came from the Baltic states or Russia.”
- “[The investigations in Kalmarsund](#) showed at once that working wind turbines **were not avoided** by passing bats. On the contrary we soon discovered that some bats were attracted by the turbines. In suitable weather passing bats spent some time searching and hunting insects around turbines (also around the moving blades) and 21 VINDVAL Report 5571 - Bats and offshore wind turbines then went on in the same direction. Radar studies also showed that the large species, mainly *Nyctalus noctula*, searched wide areas around the turbines and went to and fro in all directions. **By direct observations we saw them hunting close to the blades but also near the**

water surface. Flying insects were often gathering around the turbines and also at the nonmoving boat. This attracted bats for hunting there. There is no doubt that offshore wind turbines often can attract insects and thereby hunting bats. Bats can use windmills as roosts sometimes regularly over a longer period. According to an interview with a service technician, **bats were found in the generator house of an offshore wind turbine east of Blekinge in the summer 2003.** When we visited the windmills in case in 2005 and 2006 we repeatedly observed *Pipistrellus pygmaeus* flying early in the evenings with territorial calls, a number of *P. nathusii*, and we also observed the rare species *Nyctalus leisleri* repeatedly, facts that might indicate that the mills served as roosts. We also observed how *Nyctalus noctula* tried to find rest sites on a turbine.”

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- [“If bats use turbines as roosts](#) there are certainly other risks especially if they are exposed to high voltage.”
- [“At every installation](#) activity in the area has to be studied and documented in an EIA (Environmental Impact Assessment).”
- This image (next page) portrays the density of action of eiders and geese flying near and through an offshore Danish wind “farm.”



Species at risk:

Bird/bats and others at risk from wind turbines in Lake Erie:

- Passerines (songbirds) during their nocturnal, seasonal (fall, spring) migrations
- Threatened and endangered (piping plover, common tern) plus declining species (red knot, other migrating shorebird species) during fall/spring migrations and summer/winter residence
- Large-bodied, slow fliers (pelicans, gulls)
- True pelagic seabirds
- Bats at risk – migrating insectivorous species on land, or curious land based bats
- Monarch butterflies, dragonflies and other aquatic and flying insects

Lest we need reminding of the abundance, these are merely the “water” birds:

Greater White-fronted Goose 6. Snow Goose 7. Ross's Goose 7. Canada Goose 8. Cackling Goose 8. Brant 9. Mute Swan 9. Trumpeter Swan 10. Tundra Swan 10. Wood Duck 11. Gadwall 11. Eurasian Wigeon 12. American Wigeon 12. American Black Duck 13. Mallard 13. Blue-winged Teal 14. Northern Shoveler 14. Northern Pintail 15. Green-winged Teal 15. Canvasback 16. Redhead 16. Ring-necked Duck 17. Greater Scaup 17. Lesser Scaup 18. Harlequin Duck 18. Surf Scoter 19. White-winged Scoter 19. Black Scoter 20. Long-tailed Duck 20. Bufflehead 21. Common Goldeneye 21. Hooded Merganser 22. Common Merganser 22. Red-breasted Merganser 23. Ruddy Duck 23. Red-throated Loon 24. Common Loon 24. Pied-billed Grebe 25. Horned Grebe 25. Red-necked Grebe 26. Eared Grebe 26. American White Pelican 27. Double-crested Cormorant 27. American Bittern 28. Least Bittern 28. Great Blue Heron 29. Great Egret 29. Snowy Egret 30. Little Blue Heron 30. Cattle Egret 31. Green Heron 31. Black-crowned Night-Heron 32. Yellow-crowned Night-Heron 32. Osprey 33. Bald Eagle 33. Northern Harrier 34. Yellow Rail 34. Black Rail 35. King Rail 35. Virginia Rail 36. Sora 36. Common Moorhen 37. American Coot 37. Sandhill Crane 38. Black-bellied Plover 38. American Golden-Plover 39. Semipalmated Plover 39. Piping Plover 40. Killdeer 40. American Avocet 41. Greater Yellowlegs 41. Lesser Yellowlegs 42. Solitary Sandpiper 42. Spotted Sandpiper 43. Willet 43. Upland Sandpiper 44. Whimbrel 44. Hudsonian Godwit 45. Marbled Godwit 45. Ruddy Turnstone 46. Red Knot 46. Sanderling 47. Semipalmated Sandpiper 47. Western Sandpiper 48. Least Sandpiper 48. White-rumped Sandpiper 49. Baird's Sandpiper 49. Pectoral Sandpiper 50. Purple Sandpiper 50. Dunlin 51. Stilt Sandpiper 51. Buff-breasted Sandpiper 52. Short-billed Dowitcher 52. Long-billed Dowitcher 53. Wilson's Snipe 53. American Woodcock 54. Wilson's Phalarope 54. Red-necked Phalarope 55. Red Phalarope 55. Pomarine Jaeger 56. Laughing Gull 56. Franklin's Gull 57. Little Gull 57. Bonaparte's Gull 58. Ring-billed Gull 58. Herring Gull 59. Lesser Black-backed Gull 59. Iceland Gull 60. Glaucous Gull 60. Great Black-backed Gull 61. Sabine's Gull 61. Black-legged Kittiwake 62. Caspian Tern 62. Common Tern 63. Forster's Tern 63. Black Tern 64. Belted Kingfisher 64. Alder Flycatcher 65. Willow Flycatcher 65. Purple Martin 66. Tree Swallow 66. Northern Rough-winged Swallow 67. Bank Swallow 67. Cliff Swallow 68. Sedge Wren 68. Marsh Wren 69. American Pipit 69. Yellow Warbler 70. Prothonotary Warbler 70. Northern Waterthrush 71. Common Yellowthroat 71. Le Conte's Sparrow 72. Nelson's Sharp-tailed Sparrow 72. Lincoln's Sparrow 73. Swamp Sparrow 73. Red-winged Blackbird 74. Rusty Blackbird 74. Yellow-headed Blackbird

[Waterbirds of Ohio](#)

WHY WORRY ABOUT BATS?

- Bats are attracted to turbines as nesting, roosting, and feeding stations.
- Bats consume each upwards of 1000 insects per HOUR, thus being one of Nature's perfect insect control methods, without costly and dangerous chemicals.
- Bats usually have one pup per year. Changes of temperature, even TINY when they are in resting colonies, are fatal.
- Bats are largely responsible for rainforest propagation and habitat.
- Removal of nests, or habitat, and the loss of even ONE female, can potentially disrupt and destroy an entire colony.
- It is more and more recognized that bats are dangerously imperiled by industrial wind, and that entire species are at risk.

- Bats' lungs explode near the tips of the turbine blades, as the increased pressure gradient changes/air pressure, explodes paper thin lungs.
- It is increasingly known that the [number one harm to bats](#) worldwide, is industrial wind. Paul Cryan, US Geological Survey: "Bats are long-lived and very slow reproducers," he says. "Their populations rely on very high adult survival rates. That means their populations recover from big losses very slowly." He questions whether bats can handle such damage year after year.
- [Wind turbines can kill bats in two ways](#): Blunt force and what's called barotrauma. A tiny bat stands no chance against a turbine blade two train cars long, whirling at 150 MPH. Even if the bat isn't struck, spinning turbines create changes in air pressure as they move, which can essentially cause the animals' lungs to explode. But barotrauma may be less deadly than some biologists think, [according to an analysis](#) by the National Renewable Energy Laboratory.



Please note again the legal challenge in [Maryland, Filed Dec 8, 2009](#): some of these words are prophetic. Please as you read about bats (and birds) offshore, and the Lake Erie Icebreaker Proposal, reflect on this decision.

ANIMAL WELFARE INSTITUTE, et al., Plaintiffs

v.

BEECH RIDGE ENERGY LLC, et al., Defendants.

Case No. RWT 09cv1519.

United States District Court, D. Maryland.

“LIKE DEATH AND TAXES, THERE IS A VIRTUAL CERTAINTY THAT INDIANA BATS WILL BE HARMED, WOUNDED, OR KILLED...IN VIOLATION OF Section 9 of the ESA” (We expand Indiana Bats to include other

endangered species at range of risk from rotor blades of six massive turbines in Lake Erie.)

Kunz (One of the expert witnesses): "Because Indiana bats are very likely to be present on the Beech Ridge project site during three seasons of each year when turbines operate, it continues to be my opinion that there is a high likelihood that Indiana bats will be killed and/or injured by this project during its twenty-year lifespan." Kunz Rebuttal Decl. § 9 (Pls.' Ex. 5); see also Trial Tr. 48:10-22, Oct. 22, 2009 (stating that after learning about the AnaBat data and the higher mortality estimate, he is even more confident that Indiana bats will be harmed).

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*The Court agrees with these very credible expert opinions. The Court finds that there is no reason why Indiana bats would not fly at a height of 137 to 389 feet above the ground, within the rotor swept area of the turbines at the Beech Ridge Project site. Plaintiffs have presented compelling evidence that Indiana bats behave no differently *579 than other Myotis species that have been killed by wind turbines and Defendants have failed to rebut this fact. Furthermore, the Court is not surprised that no dead Indiana bat has yet been found at any wind project because few post-mortality studies have been conducted, mortality searches are generally inefficient, and Indiana bats are rare.*

Based on the evidence in the record, the Court therefore concludes, by a preponderance of the evidence, that, like death and taxes,^[49] there is a virtual certainty that Indiana bats will be harmed, wounded, or killed imminently by the Beech Ridge Project, in violation of § 9 of the ESA, during the spring, summer, and fall.

ADDENDUM

The other obvious reasons to reject a working permit for Fred Olsen Renewables, (Icebreaker) Inc., are that the power is not needed, the project will do absolutely nothing to abate climate or weather, will NOT lessen CO₂ if that is your measure, and will contribute nothing to the common good. Like Block Island, five turbines offshore, it is predictable to have technical challenges, costs beyond reason, and very few jobs. Block Island **has six permanent jobs** and the project construction cost hovers around \$300,000,000.00 Million (Three hundred million dollars). (This is prior to the cable problems that it is now surmised will add another \$100 Million to the overall cost.) (Orsted DK has now offered to purchase the project for \$510,000,000.00 (Five hundred and ten million dollars). Orsted sees this as another expansion into US tax incentives and subsidies, keeping its eyes on the eastern seaboard. (Yes, a shell game.)

In an article on the transportation of the nacelles, blades and other turbines parts to the US, Block Island, Deepwater Wind, the author notes: 300 ton nacelles are from the GE Renewables Energy Factory in Saint-Nazaire, France, the massive blades are from LM Wind Power, independent supplier of blades. Maybe we thought the towers at least would be made in the USA? No. From Aviles, Spain. Much/most of the technical expertise, also European. So much for a job utopia in the USA. The author calls the build and transport of these turbines, Huculean. But rather easy to scoop US tax dollars under a "test" project!

If you have the appetite to visualise the massive parts of ECO TRAPS being assembled and delivered, [here](#).



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The turbines' massive towers arrived in Providence, Rhode Island, from Spain. Image credit: GE Renewables



A Haliade nacelle on its way to the Saint-Nazaire port. Image credit: GE Renewable Energy

"Røset, the Fred. Olsen Windcarrier project manager, says the Block Island nacelles will traverse Atlantic waters that can produce seasonal waves of up to 6 meters. The voyage will take between two and three weeks depending on the weather and course adjustments to avoid any adverse conditions."

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Let's not repeat the cost and damage of other wind turbine "experiments." While there is a breathing chance to save Lake Erie, let us do it.

We appreciate deeply your consideration of the points offered, and thank you for your protection, for the life of Lake Erie.

Sincerely,

*Sherri Lange
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Co-Founding Director Great Lakes Wind Truth
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