

From: [Puco ContactOPSB](#)
To: [Puco Docketing](#)
Subject: public comment 16-1871-EL-BGN
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From: Tom Sullivan Jr. <tcsjr@rpminc.com>

Sent: Thursday, June 11, 2020 7:24 PM

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Subject: Appeal of OPSB Approval of Case Number 16-1871-EL-BGN: Icebreaker Wind Facility on May 21, 2020.

Dear Governor DeWine, Chairman Randazzo, Director Pelanda, Director Mihalik, Director Stevenson, Dr. Acton, Director Mertz, Mr. McCarthy, Mr. Butler, and Mr. Murphy,

On behalf of my organization, <http://nolakeeriewindfarm.org/>, and <https://www.saveourbeautifullake.org/>, and <http://www.na-paw.org/>, and <http://greatlakeswindtruth.org/>, as well as the attached 170-page petition, containing 6,729 signatures, I, Thomas C. Sullivan, Jr., of 29360 Lake Road, Bay Village, Ohio, citizen in good standing, appeal the OPSB approval of Case Number 16-1871-EL-BGN: Icebreaker Wind Facility approved on May 21, 2020.

Before I submit the specific reasons for appeal of these six 500-foot monstrosities to be placed in the middle of our great Lake Erie, I would like to let you know the groups who will not be appealing your decision. They are: LEEDCo, The Ohio Environmental Counsel, The Sierra Club, Business Network for Offshore Wind, Inc., The Cleveland Foundation, Cleveland.com, and the Fred Olsen Renewables organization.

Following your decision of May 21, 2020 on this case, all of these organizations have been whining and gnashing their teeth, that the Ohio Power Siting Board inserted a poison pill, with a condition that requires the 6 industrial wind turbines to stop turning nightly from March 1 to November 1, to protect birds, bats, and butterflies. While these groups are clamoring that this

provision will decrease revenue generated by the nightly operations of the wind turbines for 8 months of the year, they know that these things will never break even either way, with full operations or under the current proper provisions. This is because the entire LEEDCo project itself is being subsidized by the DOE, the State of Ohio, LEEDCo, The Cleveland Foundation, and Fred Olsen Renewables. These organizations are secretly cheering your decision, as your approval is their “KEY” to getting into the Great Lakes. This is much like when the key for Sollozzo to get heroin on the streets of New York and America was to kill Don Corleone, in the movie the Godfather. When he failed to do it, the Corleone family held up the sale of heroin throughout New York and America for another time. This heroin of industrial wind turbines will poison our Great Lakes, with or without the provision to stop the turbines from running at night. The key for Fred Olsen Renewable is to get these monstrosities placed in Lake Erie. This is why your decision was monumental for them, and why, with all of the gnashing of the teeth and whining about your “poison pill provision,” they are happily cheering behind the scenes, and cannot believe that the OPSB has finally approved these six 500-foot monstrosities, with their 20-mile, bird and bat killing trap, and unproven mono-bucket, bottom-of-the-lake assembly, to stir up the freshwater that flows directly into the Cleveland water crib, to the detriment of 11 million Ohio citizens. They cannot believe that finally they have an OPSB and Governor of this state who will approve of the desecration of our great Lake Erie. Because of this, you will not see one appeal from any of that group, because again, they cannot believe that you have approved it, and secondly, they already have plans to overturn your provisions, once these six 500-foot towers are erected and in place, as the first of sixteen-hundred 500-foot wind turbines in our great Lake Erie. When this happens, and my grandchildren look out on Lake Erie and hear the whoosh, whoosh, whoosh, see the blinking lights, hear about all the death and destruction of the wildlife, and the fouling of the lake water from Buffalo to Toledo, we will remember the names DeWine, Randazzo, Pelanda, Mihalik, Stevenson, Acton, and Mertz, and remember the folly of all of you, those who will destroy our great Lake Erie. You are the beginning of this, and you can stop it before it starts.

I have conveyed my concerns in detail to all of you in many ways, from the messages I have sent to all of you prior to this one, and during the public hearing in Cleveland City Hall Chambers, two years ago, that the OPSB did not even attend, instead sending two court reporters to document the proceedings. My statements have outlined why I oppose the OPSB Case Number 16-1871-EL-BGN: Icebreaker Wind Facility to be developed by Norwegian company Fred Olsen Renewables, after the purchase of LEEDCo, with permits and a lease to develop the bottom and top of Ohio’s gem, Lake Erie.

The following are my reasons for appeal and rejection of the approval of OPSB Case Number 16-1871-EL-BGN: Icebreaker Wind Facility:

1. The poor and disadvantaged citizens in and around Cleveland will be subject to paying 5x the going rate of energy for their homes and needs, based on a secret agreement between LEEDCo and Cleveland Public Power. At this time of national crisis, which is significantly impacting the poor in our inner cities on the near East Side and near West Side, the OPSB has moved forward, along with the support of the Cleveland Foundation, the Cuyahoga County Board of Directors and Mayor Jackson of Cleveland, to put into place a secret agreement, not available to the public, that will have the Icebreaker Project supplying power to those poor and disadvantaged African-American and Latino citizens of those areas, which will in turn force them to pay over 5x the going rate of abundant energy already available in Northeast Ohio, which includes

nuclear, natural gas and coal supplies on line.

2. The very reason that there are no freshwater wind turbine projects on a global scale in existence today is because the world's surface is only 2.5% freshwater, and this is the water that sustains life. All of the major offshore, industrial wind turbine projects globally today are in saltwater, because if people drink saltwater, they will die. This project, commencing so close to the Cleveland water intake crib - 3-4 miles away - will be placed right in the middle of that area, and disrupt the bottom of the lake, the dead zone of toxic sludge from when the EPA and Army Core of Engineers cleaned up the Cuyahoga River after it caught on fire in 1969. At that point, Lake Erie was deemed a natural disaster, and then the City of Cleveland, the State of Ohio and the Federal Government got together and worked on the regulations put forth in December of 1970, which marked the beginning of the EPA itself. Together, we helped create the Clean Water Act of 1972, the US Federal law regarding the discharge of pollution into the nation's lakes, rivers and streams. This area is now known as "CLA-1," and consists of layers of 30, 50 and 100 years of accumulated carcinogens, such as lead, magnesium, arsenic, mercury and PCB's, that have finally settled down nicely at the bottom of Lake Erie. Now, by slamming their unproven, mono-bucket system of the Icebreaker Project to the bottom of our great Lake Erie, Fred Olsen Renewables will penetrate this toxic mix and stir it up, just 4 miles from the Cleveland water crib, that supplies water to 1.4 million people a day, thousands of businesses, schools, churches, and recreation centers in 80 different Ohio communities. When this happens, the EPA will come full circle from 1970 until today, in helping to fix one of the great environmental disasters of America, only to create another one in the same area of Lake Erie, exactly 50 years later. This does not include the additional disruption of dredging up 11 miles of the same buried sludge on the bottom of Lake Erie in order for the cables to be connected to the onshore power plant. There is an example of a government body similar to the OPSB in nearby Flint, MI that led a tax-payer funded decision, mostly under the radar and without input from citizens, that affected 100,000 lower-income residents in that city, who, up to 3 times a day, had to trek across town to obtain fresh bottled water in large 5 gallon jugs, to be used for all of their daily needs, including cooking and bathing. Why? Because they could not use the tap water due to the actions of a government body that allowed this action to take place, with regards to their freshwater supply, without a proper environmental impact study. Is this going to happen in the current situation to those poor and needy citizens on the near West and near East sides of Cleveland, who will be the first to take this polluted water in from the Cleveland water crib, after these 500-foot monstrosities are slammed to the bottom of our beautiful Lake Erie?
3. The local unions in Cleveland, and their business affiliates, who have been sold on the premise that the LEEDCo Icebreaker Wind Project will benefit local economic development, have all been duped. If you read the NEPA report surrounding the LEEDCo Icebreaker Wind Project submission, it falsely claimed that 500-1000 local jobs would be created. If you look at the NEPA report on this project, available as public record DOE/EA-2045, Page 3-100, it clearly states, "the project will directly

employ 159 jobs...it is anticipated that many highly specialized jobs would come from outside the area.” This means highly specialized jobs coming from the UK and Norway, in the form of the crew for Fed Olsen Renewables. Further stated in the report is, “the operation and maintenance of this project, once completed, will generate 9 full-time jobs.” This is a total of 168 jobs, mostly given to those from Europe, and then gone when the project is completed. The other jobs listed in the report are “could create,” which is pitched and surmised by the Cleveland City Council and The Cleveland Foundation, that this project will be an economic renaissance and supply chain creation in Cleveland for the North American wind industry. This is a myth, because the wind towers, blades, giant suction boxes, and all components of this project will be designed and made where all of Fred Olsen Renewable products are made – in Europe, Norway and China. They will be made there and imported here for this project. Do you think that Fred Olsen Renewables company are going to outsource the manufacturing of all the key components and parts of this plumb project to get into the Great Lakes through companies local to Cleveland? Not a chance. Icebreaker Wind Power, Inc. will be Fred Olsen’s designed and built project to be slammed into the bottom of our beautiful Lake Erie, with all components imported from Europe, China and Norway, and then once the project is completed, they will be gone, leaving 9 full-time jobs behind.

4. Recent bird studies in North America have shown the alarming data that the number of birds are down by 29%, or 2.9 billion birds, which are missing since the last count in 1970. There is nothing in this study attributed to the now 63,000 industrial wind turbines in operation in North America today, but these monstrosities surely account for a portion of this slaughter. Rachel Carson’s prophetic call of a “Silent Spring,” has moved from pesticides and habitat loss for birds to the whoosh, whoosh slaughter of birds by industrial wind turbines throughout the US and Canada today. The 479-foot high, 206-foot blade industrial wind towers, to be placed 8 miles out from the Cleveland shoreline, and spaced for 20 miles off the shores of East Cleveland, Lakewood, Rocky River, and Bay Village, will create a 20-mile killing field for all species of birds, bats and butterflies that normally use this route for migration. There can be no count for this slaughter, as these beautiful creatures, once killed, will simply sink to the bottom of Lake Erie, and this is just the start. The full scale of this project is for 1,600 industrial wind turbines in Lake Erie to completely industrialize and destroy to the point of extinction the unique species of birds, bats and butterflies, millions of which cross Lake Erie in migratory patterns each year. When asked about birds, bats and butterflies in their application for the project, LEEDCo made the outrageous claim that NO birds migrate across Lake Erie that they know of. This is an outrageous statement, and in and of itself should disqualify this entire project.
5. Cleveland and Northeast Ohio do not need this additional energy source. Within 100 miles of the project, there are two, zero Co2 emission producing nuclear power plants on the shores of Lake Erie, that are already producing completely green energy, for millions of Ohioans and Americans. The Davis-Besse nuclear power station to the west of Cleveland produces 776 GWH of energy, and the Perry nuclear power station to the east of Cleveland produces 858 GWH of energy, making these 2 of the largest nuclear

power stations in the United States today. Together, they produce power for tens of millions of Ohio citizens and thousands of businesses and industries throughout the Midwest, as the most sustainable, reliable and storable mode of green energy available on the planet today. Additionally, due to the Utica and Marcellus shale oil boom, natural gas costs in the State of Ohio are extremely affordable, and some of the lowest in the nation in terms of cost. With all of this local and abundant energy, it makes no sense to approve Icebreaker as the first industrial wind turbines to be placed in the 11th largest freshwater lake in the world, risking the pollution of 147 trillion gallons of freshwater, and destroying the fragile habitat that exists in Lake Erie today. Already today, algae blooms growing in Lake Erie from agricultural runoff is threatening the freshwater supply, wildlife, and the largest walleye and perch fishing habitats in the world.

6. Attached to this email is a petition containing the signatures of 6,729 concerned citizens who are opposing OPSB Case Number 16-1871-EL-BGN: Icebreaker Wind Facility. These signatures, collected from the Save Our Beautiful Lake website and at the Cedar Point boat show, represent voting citizens of Ohio who oppose the project, and who are calling for an Environmental Impact Study (EIS) to be done, with regards to the detrimental effects that these industrial wind turbines will have, on the ecosystem of our great Lake Erie. The EIS will study the effects on the inhabitants of Lake Erie, both above and below the surface of the water, and on the shoreline. Please see the attached petition and the 170 pages of signatures from those who oppose this project, and who will certainly remember your names as the approvers of this project, should it go through without further environmental scrutiny, when they take to the polls, in every future election that you are a part of.
7. The LEEDCo, Fred Olsen Renewables, Icebreaker Wind Power, Inc. project is green, crony capitalism at work. Let's follow the money on this project. The Ohio Public Trust Doctrine, which designates Lake Erie's use of freshwater, recreation, enjoyment and tourism to the citizens of Ohio, granted the rights for the Ohio Department of Natural Resources to provide the 50-year submerged lease rights to non-profit LEEDCo, for the development of the bottom of Lake Erie. LEEDCo, which was created as a non-profit in 2009, fought to be a real project in 2013, and failed in 2014 for many of the same reasons outlined in this note. At that time, LEEDCo's CEO and main shareholder, Lorry Wagner, met Norwegian billionaire, Fred Olsen, Jr., whose companies have completed saltwater wind turbine projects offshore in the UK, the Netherlands, Norway and Sweden. So, the ODNR granted these rights to non-profit LEEDCo, which became for-profit LEEDCo, and has the exclusive 50-year rights to develop the bottom of Lake Erie, and when the purchase of LEEDCo by Fred Olsen Renewables (the foreign billionaire) happens, this will create a new company called Icebreaker Wind Power, Inc., giving them the 50-year exclusive rights to develop the bottom of Lake Erie. In June 2018, when Lorry Wagner was asked the question as to what Fred Olsen Renewables is paying himself and the LEEDCo shareholders for their company, which today is fully funded by our tax dollars via the DOE grants and others, Lorry Wagner responded that the price to be paid for the purchase of LEEDCo was confidential. Lorry Wagner did confirm that he had signed a Letter of Intent to sell LEEDCo to Fred Olsen

Renewables. Is it legal to transfer the 50-year submerged rights lease to the bottom of our great Lake Erie to a foreign, for-profit billionaire? What is the price that Fred Olsen Renewables is proposing to pay for LEEDCo? The public demands to know. Whatever the price is here, this is the price to be paid for the bottom of our Lake Erie! Is this deal and price for the bottom of our Lake Erie, to possibly be known one day in the future as the OPSB's folly? This price will most likely make Lorry Wagner and the other and unnamed LEEDCo shareholders all millionaires, all subsidized off of US taxpayer/DOE dollars. All Fred Olsen Renewables wants, or any other wind power developer needs, is the land, dirt, sand or sludge at the bottom of the body of water, to begin their project. Fred Olsen Renewables could probably give a damn about Lake Erie, our freshwater, fish stocks, birds, bats, butterflies and beauties. Throughout this whole process, we have not heard from any representatives from Fred Olsen Renewables. Why? All Fred Olsen Renewables wants is the rights for this project and the rights for future development, and the entire industrialization and ruin of our Lake Erie, which under green, crony capitalism will make the LEEDCo shareholders and foreign billionaire Fred Olsen all millionaires many times over. This is wrong and completely abhorrent to the Ohio Public Trust Doctrine, which reserves and protects the rights of all Ohio citizens for public use and enjoyment, navigation, commerce, fishing, and recreation of our Lake Erie to be unfringed. With this in mind, who enjoys the Cleveland Air Show? These six 500-foot towers going up under green, crony capitalism from LEEDCo off the shores of Burke Lakefront Airport will guarantee that there will be no more performances of the Navy Blue Angels, or the United States Airforce Thunderbirds anywhere near these monstrosities. The Cleveland airshow, traditionally held over Labor Day weekend in Cleveland, bringing in millions for the city, will be cancelled. This is just one example where the Ohio Public Trust Doctrine over Lake Erie is applied. I am not a coal executive, or a green energy company owner. I am just an Ohio citizen who lives on the shores of Lake Erie, who has 5 children, a dog and a day job selling paint. However, I can see clear as day how wrong this project is for Lake Erie, and the green, crony capitalism that is produced with the OPSB transfer of our submerged lease rights, to a for-profit shell company and foreign billionaire. I cannot believe that the OPSB and the Governor does not see this as well.

8. This project of six 500-feet tall industrial wind turbines, is no small pet project, as it approaches the height of the Terminal Tower, will blight the skyline of Cleveland and the lake shore, and ruin the beauty of Lake Erie as viewed from Avon Point to Bratenahl, and all points in between, both day and night, with its flashing lights. Goodbye star gazing over Cleveland. This will also affect the very active shipping lanes. The ships and freighters will now have to navigate around these towers, and also the flight paths for incoming and outgoing airline flights from both Burke Lakefront Airport and Cleveland Hopkins Airport. One other item not discussed, and one of the reasons the project is called Icebreaker is because unlike most saltwater areas, where there are huge offshore wind turbines, Lake Erie, from time to time and year to year, will completely freeze over. It is undetermined what effect Lake Erie and Great Lakes ice flows will have on these giant industrial towers. LEEDCo and Fred Olsen Renewables calling the project Icebreaker, projects to the public that ice will simply break aside at

the base of these giant industrial turbines. The other result comes from the saying “The Lake Erie Giveth and The Lake Erie Taketh Away,” and these monster 500-foot poles, with blades the size of 2 football fields, will snap, fall, and become corroding hunks that will litter Lake Erie where they stand. When this happens, who is responsible for paying for the clean-up? LEEDCo and the shareholders enriched by the deal with Fred Olsen Renewables? No. They will be long gone. Fred Olsen Renewables? No. They will only be liable based upon what their insurance will cover for this project, if they are even able to get insurance for this project at all, which is another outstanding question.

9. Fred Olsen Renewables is getting thrown out of Europe because industrial wind turbine projects throughout Europe, Germany and the UK are failing in great numbers, and also in Switzerland and Sweden. In Germany, they have a new term called “energy poverty,” where the energy is so subsidized from failing renewable projects that couples have to decide between paying their energy bills, or going out to dinner and a movie on the weekend. So what honor does Lake Erie have to host this project? Could they not do the first industrial wind project in Chicago? New York? San Francisco? Boston? Miami? Not to those beautiful skylines, but we can do it in Cleveland. Cleveland is one step forward, and two steps back. Cleveland, once the butt of jokes for 50 years since the Cuyahoga River caught fire, has come full circle. Putting the industrial wind turbines, first six and then sixteen-hundred in our beautiful Lake Erie, is like putting industrial wind turbines in the Grand Canyon itself. Representative Marcy Kaptur of Toledo said, “The wind farms are the beginning of a new wind powered energy grid, along the southern shores of the Great Lakes, from Buffalo to Toledo, Lake Erie is the wind energy version of Saudi Arabia.” Make no mistake about it, this project is about the total industrialization of Lake Erie, the decimation of wildlife, beauty, fresh drinking water, and the demise of tourism and property values along Lake Erie, decimating the entire region.

Although I have had a hard edge in this letter and have stated many of the unspoken facts surrounding the project, I do certainly understand and respect the important obligations in balancing the needs of power and energy vs. environmental impacts, for the entire State of Ohio and America today, that the OPSB has, and certainly as it relates to Case Number 16-1871-EL-BGN: Icebreaker Wind Facility. This is why I have used these powerful points as my appeal on behalf of <http://nolakeeriewindfarm.org/>, <https://www.saveourbeautifullake.org/>, <http://www.na-paw.org/>, and <http://greatlakeswindtruth.org/>, among other organizations, that have nothing to do with the coal industry, and flatly oppose this project based on the very strong views of thousands of Ohio voting citizens.

I am a life-long Cleveland native, now residing in Bay Village, OH, and I grew up in Fairview Park, Ohio. I am standing here today in defense of Lake Erie, as a Cleveland, who as a kid remembers the graffiti written on the side of the East 55th Street steel-dock pier, with the words “HELP ME, I’M DYING. LAKE ERIE.” (See attached picture from 1976)

Cleveland, the State of Ohio and the Federal Government answered Lake Erie’s call back then. Will you all answer the call today? Please cancel OPSB Case Number 16-1871-EL-BGN: Icebreaker Wind Facility, Once and for All!

LONG LIVE ERIELHONEN!
(The Iroquoian Indian Name for Lake Erie)

Tom

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