

From: [Puco ContactOPSB](#)
To: [Puco Docketing](#)
Subject: public comment 16-1871-EL-BGN
Date: Monday, June 22, 2020 8:06:38 AM
Attachments: [BSBO Letter to OPSB re Icebreaker 06-19-2020.pdf](#)

From: dbauman@buckeye-express.com <dbauman@buckeye-express.com>
Sent: Friday, June 19, 2020 7:33 PM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Subject: Case# 16-1871-EL-BGN Icebreaker

Please find attached letter for addition to the public comments in the Icebreaker Case# 16-1871-EL-BGN.

Thank you,

Don Bauman

Black Swamp Bird Observatory

Chair, Board of Trustees

419-410-7845

dbauman@bex.net

CAUTION: This is an external email and may not be safe. If the email looks suspicious, please do not click links or open attachments and forward the email to csc@ohio.gov or click the Phish Alert Button if available.

BLACK SWAMP BIRD OBSERVATORY

13551 W. State Route 2 ▲ Oak Harbor, Ohio 43449 ▲ 419 898-4070 ▲ www.bsbo.org

TEAMING RESEARCH WITH EDUCATION TO PROMOTE BIRD CONSERVATION

June 19, 2020

Ohio Power Siting Board
Docketing Division
180 Broad Street
Columbus, OH 43215-3797
By email: contactOPSB@puc.state.oh.us

Re: Case# 16-1871-EL-BGN

Dear Ohio Power Siting Board:

The recent ruling on the Icebreaker Wind project by the Ohio Power Siting Board seems to be drawing the ire of a few people in Cleveland. But there are some issues involved here that go beyond the self-interest of a few, and which ought to be brought out into the open discussion.

First, let me say the staffs of both the Ohio Department of Natural Resources (ODNR) and the Ohio Power Siting Board (OPSB) need to be commended for their combined years-long effort to get this decision right. They have intelligently and thoroughly considered the potential impact this project may have upon the environment, including the bird and bat life in the area of the proposed six turbine site. It's their job to protect the public resource that is Lake Erie from either unneeded or harmful development. This is not Cleveland's lake; it is a resource for all in Ohio, Michigan, Pennsylvania, New York, and Canada as well. The birds that use this area of Lake Erie do not belong to Cleveland or anybody else; they also live in Canada, Alaska, Michigan, Ohio, and Central and South America.

LEEDCo's Icebreaker project, this so-called "pioneering plan," was ill-conceived from the very beginning, those seemingly long years ago. For one thing, it sits in a Globally Important Bird Area, a fact which the Black Swamp Bird Observatory made LEEDCo aware of within the first year of their proposal. Also, it was designed as a pilot plan, an experimental project, to develop the necessary engineering technology to enable them to put another 1,500 turbines in Lake Erie. The Canadians had similar ambitions and had proposals for about an additional 1,300 turbines on their side of the lake. Yet, at the time, LEEDCo had no good concept or apparent concern for the kind and amount of ecological science necessary to demonstrate that turbines in Lake Erie pose no threat to birds and bats. And neither did the Canadians, which is why, in 2011, they issued a moratorium on offshore wind development in Lake Erie, cancelling all proposed projects. They extended that moratorium in 2017. The ecological science to evaluate the impact of offshore wind on the ecology simply is not known.

LEEDCo agreed, as a condition of their application, to provide an onboard collision detection system that would monitor collisions between the turbines and birds and bats. Those collisions are fatal. LEEDCo was awarded millions of dollars by the U.S. Department of Energy specifically to develop that collision detection technology, because it didn't exist anywhere in the world. They have not done so. The ODNR, the OPSB, and we, the public, are waiting.

The Opinion, Order, and Certificate by OPSB takes this all into account and says, in effect, when the collision detection system can be shown to do what it is supposed to do - monitor collisions between birds and bats with the turbines - then LEEDCo can proceed with the

project without the feathering requirement imposed beyond what is in the original Stipulations of May 15, 2019. But, taking into account the fact that without this collision detection system we will not know how many birds and bats are being killed, the turbines must be feathered during times when birds and bats are most likely to be in the area, that is, nighttime during the prime eight months of migration.

If the Opinion, Order, and Certificate is an indictment against anyone, it is not against Cleveland; it is against the notion that development should be allowed to proceed at any cost to the ecology as long as the economic promise is high. This is a particularly short-sighted notion, one that is reminiscent of the robber barons of previous centuries; and one to which, we are happy to say, the OPSB and the ODNR do not subscribe.

Sincerely,

A handwritten signature in cursive script that reads "Don Bauman".

Don Bauman
Black Swamp Bird Observatory
Chair, Board of Trustees
Oak Harbor, Ohio



This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/22/2020 9:38:15 AM

in

Case No(s). 16-1871-EL-BGN

Summary: Public Comment of Don Bauman, via website, electronically filed by Docketing Staff on behalf of Docketing