

FILE

13-0990-EL-BGN

**From:** Tom Stacy [<mailto:tstacy@savewesternoh.org>]  
**Sent:** Saturday, May 03, 2014 9:46 AM  
**To:** Kim Wissman  
**Cc:** Senator Seitz; Faber, Keith; [stautberg@ohiohouse.gov](mailto:stautberg@ohiohouse.gov); [batchelder@ohiohouse.gov](mailto:batchelder@ohiohouse.gov)  
**Subject:** Pending Case Number 13-0990-EL-BGN: 6011 Greenwich Windpark, LLC

To: All voting and non-voting members of the Ohio Power Siting Board and staff:

Browsing the developer's application, I was surprised to find the project developer expects to generate 21 GWHs per year from a group of (25) 2.4MW Nordex N 117 wind turbines atop 298.5 ft. towers. This represents an unprecedented annual capacity factor of 40% while the highest wind energy capacity factor realized to date anywhere in Ohio is 29% (Derived from the sum of monthly reports to DOE EIA).

Looking into the proposed high capacity factor for justification, I found that the rotor diameter of 383.8 ft creates a swept area of 115,691 square feet (2.656 acres) per machine.

I then compared this to the Blue Creek Wind facility whose turbines have a rotor diameter of 294 ft. (if the application is correct) which creates a swept area of 67,887 square feet (1.558 acres).

To my knowledge, blades as long as 190 ft. have never been used at onshore wind facilities. Furthermore, the blade circle will come within 100 ft. of the ground, a height at which even songbirds may fly while foraging.

The proposed Nordex turbine blades for 6011 Greenwich LLC's project have a swept area 70% larger than the blades at Blue Creek and an estimated capacity factor only 38% greater than Blue Creek and a nameplate capacity per turbine only 20% larger than the Blue Creek model chosen. This potentially represents a significantly greater risk to avian species (based on swept area) per wind turbine and per MWH.

Depending on maximum (governed) RPM between models, tip speed may be greater using longer blades as well. Compounded with the fact that the bottom of the blade circle would be significantly closer to ground level, this may cause additional noise issues for humans, increased barotrauma risk for foraging bats and increased blade circle exposure to a greater number of avian species.

I just wanted to bring these nuances to your, ODNR's, USFWS's and the public's attention. It is not difficult to overlook such potential interactions in the changing specifications landscape of industrial wind generator machinery. In case you have not already considered them, please do.

Finally, please circulate this letter to the appropriate contacts at USFWS and ODNR, and please also post this letter as part of the case record for the 6011 Greenwich project.

Thank you.

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