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Butler, Matthew

From:	Kevin Ledet <kaledet1@gmail.com>
Sent:	Monday, September 15, 2014 2:32 PM
To:	Puco ContactOPSB
Subject:	Exhibit P Shadow Flicker Report
Attachments:	OPSB flicker.docx

Mr. Irwin, concerning Case No. 13-0990-EL-BGN, would you please see that the voting and nonvoting members of the OPSB as well as the public comments section receive this information. Thank you Kevin Ledet

The following images were scanned as received

Concerning case 13-0990-EL-BGN

To the voting and nonvoting members of the OPSB and the public comments section,

With the OPSB refusal to grant us this simple request much of this projects misrepresentation will likely not come to the light of day. I am going to try to explain to you what appears to me as a blatant misrepresentation of data by Windlab, that has been submitted to the OPSB. Obviously, the OPSB must not review all the exhibits that have been submitted by Windlab for accuracy or they simply accept the exhibits without question. Either way it appears that the OPSB staff is so unfamiliar with the area that they can't interpret the exhibit.

Following below is a statement from the shadow flicker section out of the Staff Report of Investigation Case No. 13-0990-EL-BGN dated April 18,2014 and filed with the OPSB.

"The Applicant conducted a shadow flicker analysis of the facility to calculate the yearly shadow flicker impact to receptors within approximately 1,170 meters of turbines. The Applicant used the following inputs to calculate shadow flicker impact: turbine coordinates, turbine specifications, shadow receptor coordinates, monthly sunshine probabilities, wind speed probability distribution, wind direction data, and elevations for each residence. The model developed for this facility included 298 receptors.
The position of the sun relative to the turbine rotor disk and the resulting shadow is calculated in time intervals of one minute throughout a complete year. If the shadow of the rotor disk, which in the calculation is assumed solid, casts a shadow on a receptor at any time, then this step is registered as one minute of potential shadow impact. The model's calculations take into account the wind turbine location, elevation, and dimensions, and the receptor location and elevation. The model showed that five non-participating receptors would be exposed to more than 30 hours of shadow flicker per year by the facility. Of those five receptors, three were determined to not exceed the 30 hour limit after further evaluation using actual site-specifics conditions such as obstacles that would mitigate shadow flicker exposure. [redacted]

In exhibit P, filed by Windlab, dated December 24, 2014 there appears to be many misleading and erroneous statements. On pg.3 section 3.2 House Locations, Windlab states that "all buildings within 1170m or 3838ft (10 blade diameters) were considered in this analysis,". This is not true. There are at least 14 houses on Omega Rd. and SR 13 that are within that distance from turbine 23 that are not shown are counted, one of which appears dangerously close

to the greater than 30 hour maximum for exposure to flicker. This home is occupied by an elderly couple and the man has had a stroke. This part of the area I am familiar with and I know this to be true because I live on Omega Rd. I don't know how many other properties aren't accounted for in this report but there probably are more if they missed these.

On pg. 5 of Exhibit P under Modeling results they make a statement that there are 298 residential structures located within 1170m of a proposed turbine and all this data is included in Appendix D. If there are 298 residential structures why is there 314 House ID numbers in Appendix D? The 298 residential structures count is already wrong by not including the 14 houses from Omega Rd. and SR 13 and now adding another 16 residences, who is doing the math?

On pg. 6 of Exhibit P section 4.1 House 272, this is a very interesting read. Even though this house is an involved landowner, (leased) Windlab states that it has the potential of experiencing 63 hours of flicker per year. This is the results of 4 turbines 17, 18, 20 and 21. The report goes into a lengthy discussion of winter solstice and which of these 4 turbines will impact this house and when and for how long. My big problem with this data is, how did they come to this conclusion:
Turbine 17 is approximately 1.5 miles NNE of this residence.
Turbine 18 is approximately 2 miles almost due north of this residence.
Turbine 20 is approximately 2.2 miles NNE of this residence.
Turbine 21 is approximately 2.3 miles NNE of this residence.

None of these turbines will ever have any flicker impact on this residence. The question needs to be asked, how did Windlab's computer model come up with this data? How many other mistakes are in this report?

This is, at least to me, something that should not be overlooked. In the green highlighted area, the applicant (Windlab) has stated that any turbine forecasted prior to construction to create in excess of 30 hours per year of shadow flicker at a non- participating receptor will be subject to mitigation or minimization. The staff recommends no more than 30 hours flicker at any non-participating receptor, with a complaint resolution process being established. With the above listed examples of corrupted data, should this flicker report be trusted? Could you please direct me to anyone who has authority to review this type of information and has authority to bring it to a proper resolution?

Sincerely Kevin Ledet
Chairman Greenwich Neighbors United