

From: [Puco ContactOPSB](#)
To: [Puco Docketing](#)
Subject: FW: Letter opposing Icebreaker, Case # 16-1871-EL-BGN
Date: Monday, February 27, 2017 9:47:16 AM

From: salbright2@aol.com [mailto:salbright2@aol.com]
Sent: Friday, February 24, 2017 7:08 PM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Subject: Letter opposing Icebreaker, Case # 16-1871-EL-BGN

Ohio Power Siting Board
Attention: Mr. Matthew Butler

Good Evening:

I am writing to express strong opposition to the Icebreaker Project, Case # 16-1871-EL-BGN. When this project was originally submitted to the OPSB for permitting, it failed to meet the permit requirements and was rejected on April 7, 2014, many objections coming from the ODNR and USFWS.

In its assessment submitted to the OPSB in response to the first Icebreaker proposal, the USFWS stated, "The waters around Cleveland provide important overwintering habitat for gulls (herring, ring-billed, Bonaparte's great black-backed, etc), ducks (greater and lesser scaup, red-breasted and common mergansers, goldeneye, bufflehead, redhead, canvasback), common loons and horned grebes. During winter flocks of over 10,00 birds are not uncommon...". The document goes on to describe Icebreaker documents citing European offshore wind energy experience to draw information, but fails to admit that several European countries have banned offshore wind facilities from within **12 miles** of the shoreline, suggesting this is likely in part due to the congregations of waterfowl near shore! Based on LEEDCo's own environmental assessment, they report that between 4-13% of migrants fly within the height of modern wind turbine rotors and that tens to hundreds of millions of birds migrate over Lake Erie. The USFWS states, "Based upon these numbers it would mean that between 400,000- 13,000,000 songbirds fly at rotorswept height when flying over Lake Erie."

From the ODNR regarding red-breasted mergansers: "Lake Erie is an extremely important staging area for this species, with huge numbers congregating in November and early December. Some observers have estimated as many as **250,000 red-breasted mergansers being seen from one spot in a day** - a huge percentage of the overall population. They are not often heard here, but they utter low guttural croaks and higher-pitched cackling sounds." That is just one of the 350 or so species of birds, bats and waterfowl found in and flying over Lake Erie!

Both the ODNR and USFW provide further detail regarding potential death to bats (including endangered species), and raptors protected under the MBTA (including bald eagles). Their letters to the OPSB were submitted on April 7, 2014 and March 24, 2014 respectively. Although the case number for the Icebreaker at that time was 13-2033-EL-BGN, and that case has been removed from OPSB cases, these scathing reviews of the Icebreaker express negative impacts that are not specific to just that original project. These assaults on wildlife continue to be legitimate expectations and apply to any and all proposals for industrial wind facilities in Lake Erie!

The Great Lakes contain approximately 21% of the world's fresh water, the greatest fresh water source on earth. That is why hundreds of millions of birds and bats need Lake Erie to be protected from all further industrialization, and particularly from becoming an industrial power plant, if they are to survive. And by the way, if the lake becomes a slaughtering field for avian and bat species, the human harm will also be significant! I will address that in a future letter.

Because of its shallow depths, Lake Erie is an internationally important avian and waterfowl wintering and staging area. And whether radar or any other sophisticated method is used to record avian and bat

heights, quantity, and direction, it will not matter. Different species and types do not follow the exact path every year. Further, low and high air pressures, temperature, wind speed and direction change yearly. Avian flights will vary, and there are no three to five year studies that I can find that can provide evidence that industrial wind turbines in Lake Erie will not cause ongoing, permanent slaughter of all species that migrate over, forage in, and seek habitat in Lake Erie. The bottom line- millions of birds, ducks and bats frequent Lake Erie and MANY, MANY will be killed. The number of turbines proposed for the Icebreaker project might not result in extinction of species, but neither will those few turbines result in significant energy production. This is a "demonstration project", meant to prove that Lake Erie produces enough wind to become home to thousands of turbines. THAT WILL RESULT IN THE DEGREE OF PAINFUL, BLOODY AVIAN SLAUGHTER DISCUSSED IN THIS LETTER.

Further, wind developers are responsible for self reporting of avian deaths, as many have coined, "Engaging the fox to guard the hen house". As I have stated to the OPSB in the past, wind developers use counting methods such as counting carcasses for 6-8 hours once a month within a specific range, typically a narrow diameter around the base of each turbine. How can it be possible to count bloody carcasses in Lake Erie (or any other body of water), even using sonar or other technology? It is constantly moving, often with strong winds, rain or snow, and high waves! What difference would it make anyway? Dead is dead. There is no "mitigation"!

This letter only touches on the subject of avian risk, and does not address threats to aquatic species, drinking water, danger from blade shear and ice throw, turbine fires and explosion, tower collapse, the Public Trust, and more. I will be writing again.

Respectively Submitted,

Suzanne Albright
Principal, Great Lakes Wind Truth

salbright2@aol.com

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in

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

Summary: Public Comment in opposition filed on behalf of concerned consumer, Suzanne Albright electronically filed by Docketing Staff on behalf of PUCO Staff