

FILE

16-1871-EL-BGN

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To:

Ohio Power Siting Board

Pending Application for #16-1871-EL-BGN: Icebreaker Wind Facility, Lake Erie

Public Comments

Please find attached the critical comments about the subject project that Michele Franz, President of the Presque Isle Audubon Society, of Erie, Pennsylvania wrote in the PIAS Newsletter- The Tern of Events, See pages 1, 2, 3, and 5.

Thank You

Tom Wasilewski

Tom Wasilewski July 1, 2017

P.O. Box 575

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2017 JUL -7 PM 2:10

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TERN OF EVENTS

PRESQUE ISLE AUDUBON SOCIETY NEWSLETTER
SEPTEMBER 2015 ISSUE 15:07

To conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the enjoyment and benefit of humanity and the earth's biological diversity in northwestern Pennsylvania.

THE PRESIDENT'S PERCH

Last month in my Perch, I talked about the attack being waged by some in the federal government against the Migratory Bird Treaty Act (MBTA). The most recent attack includes proposed changes in language to the MBTA as part of HR 493 that exempts from criminal liability anyone who accidentally or incidentally kills a native bird while conducting otherwise lawful activities, such as running a wind "farm" or spilling over 200 million gallons of oil into the ocean. Oops! Some sources estimate that the bill has only a 5% chance of being passed, perhaps that is because it is a ludicrous bill or perhaps because it is such a blatant attempt by the Representative who proposed it to curry favor with the energy giants...Did I say that? Remember, this is an editorial.

Each article I write leads me to ideas and information for future articles and last month I read with interest (and some dread) information related to the development of wind energy on Lake Erie. Prior to that I knew that there was some interest in developing wind energy on the lake, but must confess that I was not aware of how close we are to the potential reality of it. A couple of years ago I was approached by a prominent local educational organization about giving a presentation relating to bird migration on Presque Isle. While working out the final details of the presentation I was told that my presentation "should have some sort of component or messaging for the promotion of renewable energy, especially offshore wind." What?!? I immediately rescinded my offer to do the presentation as did my co-presenter. As

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I stated, I did not know a lot about the effect of offshore wind energy, certainly not enough to promote it as a part of my presentation. Even now, I rely on the expertise and research conducted or endorsed by such groups as the American Bird Conservancy (ABC), Sierra Club (which favors offshore wind in Lake Erie, but not until after very thorough environmental impact studies) and National Audubon to inform myself and form my opinions. Granted, these organizations are on the left end of the scale, but they don't have the vested interest (read: Millions of dollars in government subsidies) that "researchers" employed by the industry or its supporters have in seeing these projects come to pass. (Cont. on Page 2)

SEPTEMBER THINGS TO DO!



September 13, Sunday - Shorebirds Field Trip
At Presque Isle 1st Parking Lot - 7:30 to Noon
September 15, Tuesday - PIAS Executive Board
Meeting at 7:00 p.m. in the Board Room
September 18, Friday - PIAS General Meeting
and Program: Room 112 at the TREC
7:00PM - Social
7:30PM - Thirty Years of Change Within
Wetlands along Lake Erie by Jim Bissell (P. 6)

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The *Term of Events* is published by the **Presque Isle Audubon Society**, a chapter of the National Audubon Society and a member of Audubon Pennsylvania serving northwestern Pennsylvania including Erie and Crawford counties.

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THE PRESIDENT'S PERCH (Cont.)

Additionally, these organizations are aware that the current dependence on fossil fuels is not sustainable and know that "green" energy alternatives are better for the environment and ultimately birds and other wildlife. As I stated in my August Perch, however, we must make sure that as we move towards greener energies we do what we can as stewards of the environment and advocates for wildlife/birds to see that it's done right.

I imagine that many of you are familiar with the Lake Erie Energy Development Corporation which describes itself as a *regional non-profit economic development organization building an offshore wind energy industry in Ohio*. They are currently moving through the stages of developing the Icebreaker project which consists of six turbines to be placed seven miles off the coast of Cleveland that will serve as an "experiment" and precursors to a much larger off shore wind project. That could be an economic boon to the Cleveland region, but a potential catastrophe for migrating birds and bats. In my mind, and those of many others, too many questions remain. Statements made by David Nash, a lawyer in an environmental law firm in Ohio working to help LEEDCo gain approval for the project point up just how little we know about offshore wind energy:

Nash says coordinating among so many agencies is a challenge, especially since none of them has experience with offshore wind farms in North America. He says they have to work together, and sometimes invent protocol.

"We have to ... sort of invent if there are gaps in the current regulations because the regulations were written at a time when no one really thought about putting wind turbines in the Great Lakes, or offshore, even in the Atlantic Ocean for that matter."

(Cont. on Page 3)

THE PRESIDENT'S PERCH (Cont.)

Two organizations that are keeping a close eye on wind development in the Great Lakes are the ABC, mentioned above, and the Black Swamp Bird Observatory (BSBO). These organizations joined forces and wrote a letter of concern to the Ohio Power Siting Board about the LEEDCo Icebreaker project. Based on their letter, they were asked by LEEDCo to review a white paper developed by the consultant hired by LEEDCo regarding the potential impact the project could have on migrating birds in Lake Erie. ABC and BSBO have taken LEEDCo to task in what appears to be a very thorough review and equally comprehensive response to that white paper. The following are just a few points made by the reviewers at ABC and BSBO. To read or download the full review, please go here to the BSBO website: http://www.bsbo.org/uploads/3/0/8/0/30807041/leedco_white_paper_review.pdf

~The white paper was written by a paid consultant of LEEDCo and, therefore, clearly a conflict of interest.

~This particular consultant has a history of downplaying the potential impact of wind energy on birds and bats

~The authors of the white paper incorrectly cite a peer reviewed article stating that the new larger, turbines are safer than the older turbines for birds and bats when in fact that article found that the opposite was found to be true.

~The white paper claims to be based on extensive peer-reviewed articles, but many were decades old and the authors did not include many newer research articles that estimate and predict extensive losses of birds to wind energy development

~The fact that post-construction bird and bat mortality studies would be very challenging if not impossible is not addressed in the paper. This makes the siting of the project even more critical.

~There are no studies or references cited to support the author's conclusion that bald

eagles are not likely to be affected at all by the Icebreaker project.

~The authors downplay the role of wind energy in bird and bat mortality when compared with other sources. They also do not include the findings of a peer reviewed study that concluded that estimated the annual losses of birds and bats at 573,000 and 888,000, respectively to wind turbines at 2012 build-out levels, not to mention the many more turbines that exist in 2014.

The ABC and BSBO representatives conclude their review by suggesting some steps LEEDCo should take to strengthen their case for the experimental Icebreaker project. I believe their points to be valid and recommend that you read them for yourself at the link I included above.

If you are wondering why you and I should be so concerned about this project in a neighboring state, I would like to point out that our County Executive, Kathy Dahlkemper, with unanimous consent from the County Council, has joined the Lake Erie Energy Development Corporation and now serves on its board. Why would a county government in Pennsylvania join a nonprofit devoted to building offshore wind energy industry in Ohio? Well, perhaps because the initial group of six turbines are just the beginning of what is projected to be a much larger scale wind energy project in the lake, the plan is actually for 1700 additional industrial scale turbines. In an article in the Erie Times news (April 24, 2015), Executive Dahlkemper states that while she believes in wind energy, her stronger belief is that developing that energy can benefit the local economy in the form of jobs; jobs at businesses located in Erie County. Perhaps businesses in Erie County might be involved in the manufacture of some of those turbines parts, perhaps. Perhaps also, if the larger plan in Ohio is an economic success, who's to say that Lake Erie in PA and Erie County might host its own turbine plantation.

(Cont. on Page 5)

THE PRESIDENT'S PERCH (Cont.)

This is why it is so important that we pay attention to what is going on in all of our lake(s), our oceans, our lands and our planet. We can't afford to let the chips fall where they may without holding the developers accountable and making sure they conduct thorough and independent environmental impact studies. It is clear based on Mr. Nash's statements that the current voluntary guidelines regarding placement of wind turbines (there are NO government regulations in place) are grossly lacking. It is up to organizations such as ours to hold developers accountable and push for Bird Smart Wind Energy as outlined by the ABC. This includes careful siting and mitigation as crucial elements in preventing unintended impacts to America's native birds and bats. For more information about Bird Smart Wind Energy, go to:

http://www.abcbirds.org/abcprograms/policy/collisions/wind_developments.html.

~Michele Rundquist Franz, President, PIAS

MEMBERSHIP REPORT

The Presque Isle Audubon welcomes the following new members into our chapter. Once you join National Audubon, you are automatically a member of our local chapter.

Erle: Annmarie Ropelewski, James Davis, Helen Winslow, David Underman, Karen Lipman, Judith McKibben

Edinboro: Catherine Whitley

McKean: Karl Frankovitch, David Kuchinski

Meadville: Judith Falvey

North East: Jean Fletcher

Also our Chapter only members are:

Nancy Lamanna, Gert Bollinger, Bob Gross, Ned Carlson, Sandy Carlson, Wendy Swanson

~Ron Intrieri, Membership Chairman
membership@presqueisleaudubon.org

AUDUBON BIRDERS NEEDED!

LUTHER MEMORIAL EARTH ACTION PROJECT FOR 2015-2016 BIRD COUNT AND SURVEY

Nate Millet is working with Luther Memorial on their Earth Action Project this year and he **asked that Audubon birders be informed of this project.** Here's the scoop.....

The students are going to be doing a Bird Count and Survey throughout the school year at multiple location on Presque Isle. They are in need of some knowledgeable individuals to help guide them at a few locations there. The locations are as follows:

Bayside Neck
Marsh Deck (the leaf)
Cookhouse (Bayside)
Rotary Pavilion
Lily Pond
Marina entrance
Beach 11
Pine Tree Trail
Beach 1 Lakeside

The dates they will be going out are all on Thursdays:

Sept. 24
Oct. 29
November 19
Feb. 25
March 17
April 21

Please let me know immediately if you would be able to volunteer to help these students out. Each site will have one group with about 6-7 students each. They will be all coming at the same time from 12:00 to 1:30. Thanks
Nate Millet, Education Manager

Environment Erie
814-440-3953
nmillet@environmenterie.org

~Janet Price, Editor