

Public Comments 16-1871-EL-BGN

**From:** Sherri Lange [<mailto:kodaisl@rogers.com>]

**Sent:** Friday, July 6, 2018 3:20 PM

**To:** Puco ContactOPSB <[contactopsb@puco.ohio.gov](mailto:contactopsb@puco.ohio.gov)>; Haque, Asim <[Asim.Haque@puco.ohio.gov](mailto:Asim.Haque@puco.ohio.gov)>

**Cc:** Kasych, Shawn <[SHAWN.KASYCH@OHIOHOUSE.GOV](mailto:SHAWN.KASYCH@OHIOHOUSE.GOV)>; Kessler, John

<[John.Kessler@dnr.state.oh.us](mailto:John.Kessler@dnr.state.oh.us)>; Krawczyk Joseph W CIV USARMY CELRB (US)

<[joseph.w.krawczyk@usace.army.mil](mailto:joseph.w.krawczyk@usace.army.mil)>; Liz Hartman <[liz.hartman@ee.doe.gov](mailto:liz.hartman@ee.doe.gov)>; Siegfried, Stuart

<[stuart.siegfried@puco.ohio.gov](mailto:stuart.siegfried@puco.ohio.gov)>; [dan\\_everson@fws.gov](mailto:dan_everson@fws.gov); [angela\\_boyer@fws.gov](mailto:angela_boyer@fws.gov);

[kraig\\_mcpeek@fws.gov](mailto:kraig_mcpeek@fws.gov); [lori\\_nordstrom@fws.gov](mailto:lori_nordstrom@fws.gov); Hazelton, Erin <[Erin.Hazelton@dnr.state.oh.us](mailto:Erin.Hazelton@dnr.state.oh.us)>;

Roak Parker <[projecticebreaker@ee.doe.gov](mailto:projecticebreaker@ee.doe.gov)>

**Subject:** Please accept our additional comments on Icebreaker, Case 16-1871 El GBN

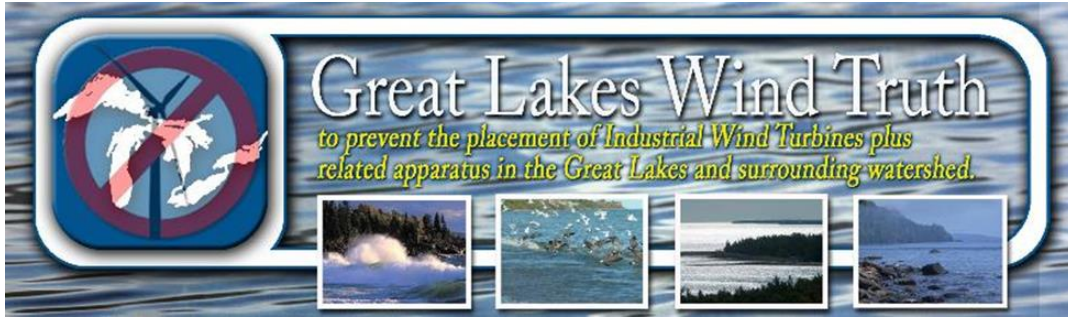
Good afternoon, Matt, Chairman Haque,

Please file these comments in Case 16-1871 EL GBN Icebreaker. The comments pertain to omissions, and errors in the MOU responses from the LEEDCo/Fred Olsen group to your office. These are not a full examination of our findings, but a sample.

We respectfully request a full EIS in order to examine and correct these and other discrepancies.

Best wishes,

Sherri



# Submission for Icebreaker, Case 16-1871 EL BGN

Date: July 5, 2018

## NOTES ON READING ICEBREAKER'S REQUEST TO RESUME TIMELINES FOLLOWING OPSB MOU REQUIREMENTS

### Questions:

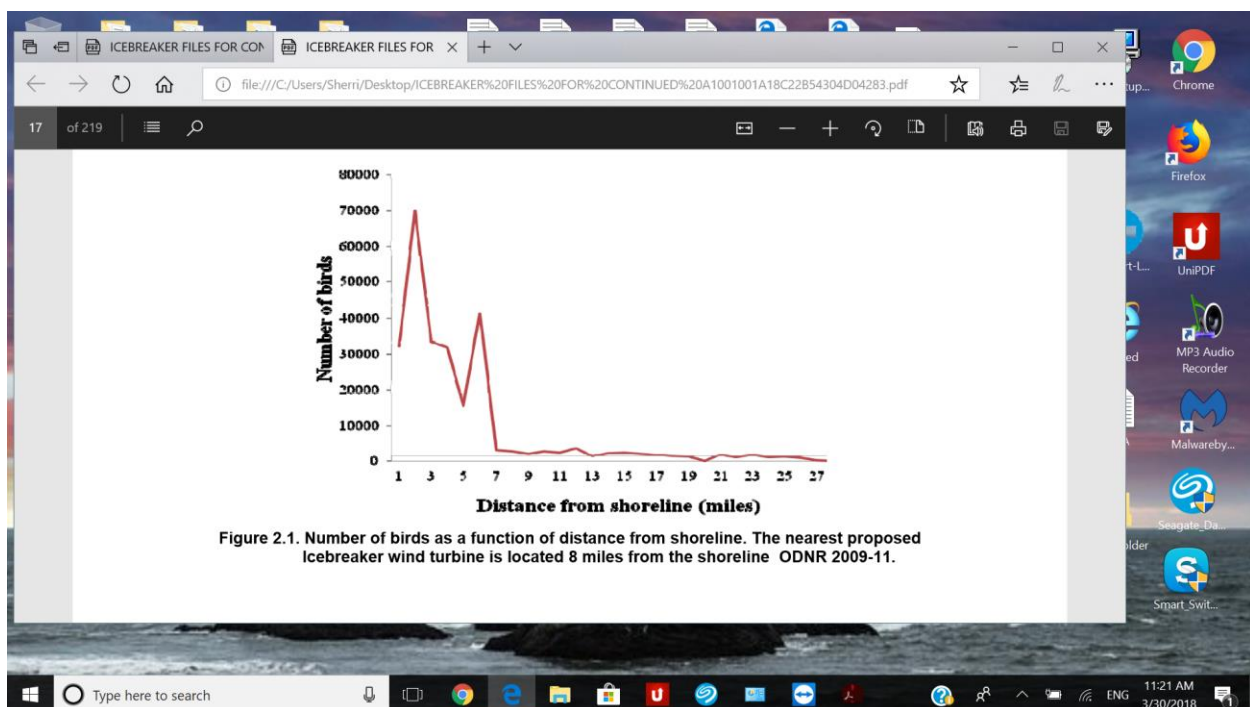
Where are the multiple kinds of studies, not just radar, showing the SPECIES? Radar alone cannot identify species. How will the developer protect endangered, or at-risk species? The radar sample provided by the developer is a narrow slice; how does he expect to extrapolate meaningful data from this? Where are the other studies, and audio files, including human observation, over years? It is our submission that given the density and complexity of migration over Lake Erie, and the developer's inability to accept that wildlife flies OVER the Lake, that the pause button needs to be applied immediately. The MOU

information in reply to the OPSB’s requirements, is in our view, not even close to realities, and given uncertainties about possible impacts. Many scientists and observers have commented on the need to fully understand the possible impacts, before any further thought is given to this proposal, and the obvious “gusher” proposals that lie in its wake.

Please see this quote:

[https://etd.ohiolink.edu/!etd.send\\_file?accession=akron1449157127&disposition=inline](https://etd.ohiolink.edu/!etd.send_file?accession=akron1449157127&disposition=inline)

*Though regional differences exist, long distance migrants appear to suffer the highest mortality rates (Ellison 2012). Responsible siting of future wind farms is imperative for the conservation of these ecologically and economically important species (Hayes 2013). To that end, increasing our understanding of the timing and duration of migration and identifying existing migratory pathways should be a priority for future research. Bats migrating through northern Ohio may face manmade obstacles along their route in the near future.*



*This diagram (above from the MOU materials) indicating low numbers of offshore birds as a function of distance, is completely disingenuous. Please tell us how you determined there are so few offshore birds, and why you have failed to reference obvious densities of migration ACROSS the lake at times of the year.*

“There is a general understanding that birds do congregate along the coastline as a response to this formidable migration barrier. However, this in no way infers that large numbers of birds are not flying across the lake. **Considerable data collected in the Western Basin of Lake Erie, between Long Point, Ontario and Presque Isle, Pennsylvania, and Rondeau Point, Ontario and Cleveland green spaces suggest there is massive lake crossing. Recent Motus tower studies have recently found that large numbers of migratory bats are also flying across the lakes (Mackenzie, pers. com.).**”

**From ODNR commentary: (see link below)**

As one of seven members on the Ohio Power Siting Board (OPSB), the Ohio Department of Natural Resources (ODNR) has voting power for proposed wind energy projects in the state of Ohio that will produce over 5 megawatts of power. ODNR is tasked with providing perspective on ecological concerns associated with the siting of wind energy facilities and has recommended our study site as one requiring “extensive” wildlife surveys prior to the development of wind energy (fig 1.3). **The collection of wildlife movement data in and around this area is critical for the responsible siting of renewable energy and will add to our limited knowledge of these animals’ natural history.**

Figure 1.3 ODNR Recommendations on wildlife surveys for proposed wind energy facilities (source: <http://wildlife.ohiodnr.gov/portals/wildlife/pdfs/species%20and%20habitats/windwildlifemap.pdf>)

The goal of this research is to determine how bats are utilizing the western basin of Lake Erie during spring migration using active and passive radio telemetry. Migratory birds perceive the Great Lakes as ecological barriers (Diehl et al. 2003). **If the same is true for bats, the southern shore of Lake Erie represents the last opportunity for migratory bats to stop before crossing the Lake directly. We took advantage of this funneling effect to capture and study migratory bats en route to their breeding grounds. We hypothesize that the western basin of Lake Erie serves as a pathway for migratory bats stopping over along the shore and migrating over water north to Canada.** Kniowski et al. (2012) captured and tagged migratory bats in the western basin of Lake Erie in the spring of 2010 and 2011 and noted the disappearance of more than half of their radio-tagged bats. **They suggested**

the possibility of a migratory route directly north across the Lake. The limited scope of their passive telemetry array prohibited them from testing this hypothesis. With the growth of a network of passive receiver stations in southern Ontario and improvements in technology, we are now better able to track large scale movements of migratory animals. We will take advantage of the expanded array of passive telemetry towers in southern Ontario to test the hypothesis that migratory bats cross Lake Erie during spring migration. We predict that a significant proportion of silver-haired bats and eastern red bats will cross Lake Erie directly during spring migration. Because weather variables are known to correlate with bird and bat movements during migration (Richardson 1990, Berthold 1993, Cryan and Brown 2007, Hatch et al. 2013, Mellone et al. 2015), we will also investigate the weather variables associated with migratory bat movements in this study.

## NOTES FROM AUDUBON PA

<http://community.pasenategop.com/wp-content/uploads/sites/56/2014/03/vanfleet.pdf>

### Excerpts

I would like to thank you for the opportunity to testify at this hearing on the biological ecological impacts of the proposed offshore wind project/s on Lake Erie.

My name is Kim Van Fleet. I am a wildlife biologist employed in the capacity of Important Bird Area Coordinator with Audubon Pennsylvania. Before and during my employment with Audubon I have also served as adjunct faculty in the Biology departments of Shippensburg University, Penn State University Harrisburg Campus and Dickinson College teaching numerous courses including Ornithology, Ecology, and Environmental Science. As a biologist my concerns about industrial scale wind turbines are many so therefore it is important to note that not all of the testimony I give will be that of Audubon but will also be from my own perspective and experiences as a wildlife biologist who has been studying this issue over the past six years.

## **Importance of Lake Erie relative to the Atlantic Flyway and Bird Migration**

As you may or may not know Lake Erie and its coastline are important components of a principle route of the Atlantic Flyway. The Atlantic Flyway is a migration corridor used twice a year during spring and fall migration by a plethora of birds including waterfowl, shorebirds, songbirds and other landbirds that journey to and from their wintering and breeding grounds. It extends from the offshore waters of the Atlantic Coast west to the Allegheny Mountains curving northwestward across northern West Virginia and northeastern Ohio, then continues across the prairie provinces of Canada and the Northwest Territories to the Arctic Coast of Alaska. The heaviest concentration and movements of birds, within this flyway occur along the coasts, mountain ranges and large river valleys conforming very closely to major topographical features oriented in their general direction of the travel.

### **Atlantic Flyway Map**

The Atlantic Flyway route from the northwest and north in particular is of great importance to migratory waterfowl including but not limited to Canvasback and Red-headed Ducks, Lesser Scaup, Teals, Loons and Tundra Swan that over winter on the marshes, back bays and waters south of Delaware to the Chesapeake Bay areas further south.

Lake Erie and its surrounding environs are a critical component of this particular migration corridor in that this region of Pennsylvania. It is one of a few migration stopover/staging areas where these birds can rest, forage and put on additional fat reserves to complete their long journeys. It should also be noted at this point that this principle migration route of the flyway narrows over the west to east breadth of Lake Erie and as such migrating birds tend to concentrate along its shoreline or narrow crossing points.

There are real concerns that any industrial scale wind facilities located offshore could result in more serious impacts on migrating populations considering the high concentrations of migrating birds that funnel across Lake Erie. The magnitude of bird strikes could potentially be much higher than onshore sites depending on where birds occur in migration relative to turbine configurations. What compounds this issue is if and how any quantitative or qualitative post construction studies could be accomplished regarding collision frequency and extent of bird strikes/kills could be effectively documented offshore due to the following:

1. When birds collide with spinning rotor blades they are frequently dismembered making them difficult to identify.
2. Bird bodies or body parts will only remain buoyant for limited periods of time. Once they become saturated they will sink below the water surface. Feathers may remain on the surface longer depending on the surface tension of particular feather types and feather structure.
3. If bodies or parts are somehow collected the degree of deterioration depending on how long they

were in the water will be a factor in making correct identifications 4. Scavengers such as gulls and other aquatic organisms like fish will readily predate on floating or sinking carcasses and parts. 5. Observers will need to be highly skilled at identifying body parts of individual species or single feathers to assure correct identification of bird species. Additional concerns would be increased risk of scavenging birds colliding with turbines and potential disruption of bird movements through the region during spring and fall migration. Post construction surveys at two offshore Danish wind facilities (Fox et al. 2008) showed that certain waterfowl species were displaced from traditional stopover areas where turbines were constructed. Other birds that did return to the area avoided the turbines by flying around the entire configuration as opposed to flying through the arrays. Overall mortalities were low however in both cases regular behaviors, movements and foraging activities were disrupted and additional time and energy was spent in finding new resource areas or maneuvering around the structures. In addition, the authors pointed out that cumulative impacts from this and other planned facilities would most likely have an additive impact on waterfowl species. A scenario likely to be repeated in Lake Erie should turbines be constructed there.

**Question:** Where is the acknowledgement of rare and endangered species, such as the obvious impact pending to the Kirtland's Warbler? Please note the comments by Kim Kaufman BSBO (Black Swamp Bird Observatory), and Michael Hutchins of ABC (American Bird Conservancy).

<https://www.birdwatchingdaily.com/blog/2017/11/01/turbines-lake-erie-kirtlands-warblers/>

“Based on our exhaustive review of the EA, we see no evidence to support the claim that the project poses little to no risk to birds and bats,” said Kimberly Kaufman, BSBO’s executive director. “In fact, having conducted more than 30 years of migratory bird research along Lake Erie, we believe the six-turbine Icebreaker project would pose a significant threat to wildlife — not to mention substantially increased impacts that would be triggered by the planned expansion of the project to more than 1,000 turbines.”

The organizations highlighted five major concerns in their [comments](#), which were submitted to the Army Corps of Engineers and the Department of Energy:

1. The proposed Icebreaker project site is approximately seven miles from the Lake Erie shoreline, near Cleveland, Ohio. Five recent advanced radar studies conducted by the U.S. Fish and Wildlife Service have recorded vast numbers of migratory birds and bats within 5 to 10 miles of the Great Lakes shorelines, including Lake Erie. Many were flying within the rotor-swept area of wind turbines. In addition, this is a Globally Important Bird Area (IBA): The Ohio waters of the Central Basin of Lake Erie have been registered with BirdLife International and the National Audubon Society as globally significant habitat for birds. “The Global IBA designation should be an



automatic trigger for a more detailed Environmental Impact Statement (EIS), instead of a cursory EA,” said Kaufman.

2. Dismissing any threat to the endangered Kirtland’s Warbler, the assessment cites outdated studies and ignores [new data](#) from birds fitted with radio transmitters. These data show that the species uses the airspace of central Lake Erie almost exclusively for its fall migration. The site selected for the Icebreaker project turbines could put the entire world population of this rare species at risk.
3. To reach the little to no impact conclusion, the industry assessors relied on limited visual surveys conducted only during daytime and in good weather to conclude that migrating birds fly at a height sufficient to avoid the turbines’ blades. However, many songbirds and most bats migrate at night. The risk they face from wind-energy facilities is likely greater during conditions of high winds, heavy rain, fog, or low cloud cover, which can affect flight altitude and bring them within the rotor-swept area of the turbines.
4. **The assessment erroneously concludes that migratory birds and bats avoid crossing Lake Erie, instead flying around it. As Kaufman states, “Anyone watching birds on the shore of Lake Erie can see that birds do in fact fly over the water. Studies also show with certainty that given good physical condition, large numbers of migratory birds and bats cross the lake, many of them making the long journey after stopping at the shoreline to rest and feed.”**
5. The EA fails to acknowledge similar existing or planned projects throughout the Great Lakes that could increase the cumulative impacts on birds and bats — an evaluation required by the National Environmental Policy Act (NEPA). What happens with the Icebreaker project could set an important precedent for the Great Lakes region on both sides of the border. Ontario, for instance, has placed a moratorium on any open-water wind facilities in Lake Erie until Icebreaker is decided. (Our note: Ontario has just elected Doug Ford as Premier, and his perspective is that wind turbines are a scam, and he intends to mitigate all the harm done thus far. Ontario is not likely by any stretch of the imagination, to lift the offshore moratorium, with any or no turbines on the US side.)

## Additional comments from ABC (American Bird Conservancy and BSBO (Black Swamp Bird Observatory, 2017)

[https://abcbirds.org/wp-content/uploads/2017/10/DOE\\_EA\\_Complete-Documents\\_BSBO\\_ABC.pdf](https://abcbirds.org/wp-content/uploads/2017/10/DOE_EA_Complete-Documents_BSBO_ABC.pdf)

*Page 2-29 Section 2.5.2 – Comments from the U.S. Fish and Wildlife Service (FWS) were extensive and blunt in the need for a detailed environmental assessment. Comments included but were not limited to:*

- 1) *This project should meet greater rigor than land based projects because of its added uncertainty.*
- 2) *The radar study of 2010 was completely inadequate and recommended additional work be completed in 2017. As of this writing this work has not been initiated.*
- 3) ***LEEDCo studies were completely inadequate to assess risk to the Bald Eagle***
- 4) *That a valid approved post-construction monitoring plan must be developed. This has not been accomplished.*



5) That the FWS provided citations from CEQ NEPA regulations and recommended that an EIS level analysis be completed and not an EA.

## Additionally:

Page 3-29 Section 3.4.1.3 Bald and Golden Eagles – The EA fails to mention trading flights that occur regularly between Ohio and Ontario. This needs to be mentioned here and addressed in the appropriate section. The EA has failed to address important parts of the Bald Eagle life cycle and how it utilizes the habitats of the area. Page 3-29 Section 3.4.1.3 Project Area Studies – The EA indicates the Diehl et al. (2003) study supports that there are more than 2 times the number of birds over land than water along Lake Erie. (This statement is inaccurate and needs to be struck from this EA.) There was no statistical significance between land and water due to small sample size. Direct conversation with Dr. Diehl supported misinterpretation of his study. Dr. Diehl stated “This paper cannot support or refute the risk to migrating birds from turbines in Lake Erie”. Simply put, NEXRAD, is not capable of estimating numbers or risk over Lake Erie. For one thing, it does not measure flight altitude, a key factor in risk, especially under varying weather conditions, such as high winds, fog, or low cloud cover. The same shortcomings are present in the WEST (2017) analysis. Appendix J contains a review of that supporting document. In paragraph two of this section, the EA states the WEST NEXRAD study strengthened the data. While this study used more recent data and included three years instead of one, this improved sample design is negated by other flaws. For example, the study area was no more in the sample area than Diehl and was constrained by the inadequacies of NEXRAD for this particular question. A more in depth review of the WEST study is included in Appendix J.

Despite statements to the contrary, this study does not support or refute any level of risk to birds and bats. Paragraph three refers to the ODNR aerial survey. WEST took considerable and unsupported liberty with findings from this survey as well. A more detailed review of WEST’s assumptions are covered in Appendix L. There was considerable variability in bird locations and abundance, and no data were collected during winter. Furthermore, the survey covered only diurnal movement, yet this area is known to be used by nocturnal migrants. The graphs reproduced by WEST from the study are therefore highly misleading and represent low estimates of bird abundance. The Tetra Tech studies are examined in Appendix K.

Simply put, these studies were poorly designed at best. Even WEST commented in the open house that these studies were poorly designed and conducted.

- [Dismissing any threat](#) to the endangered Kirtland's warbler, the assessment cites outdated studies and ignores new data from birds fitted with radio transmitters. These data show that the species uses the airspace of central Lake Erie almost exclusively for its fall migration. The site selected for the Icebreaker project turbines could put the entire world population of this rare species at risk.

<https://wildlife.ohiodnr.gov/portals/wildlife/pdfs/publications/id%20guides/pub418.pdf>

LISTS SPECIES OF DUCKS, SWANS, ANSERIPHORMES, THAT OFTEN WINTER IN DEEP WATER. SOME MIGRATE.

Examples: Red Phalarope, Pomerine Jaeger, Laughing Gull, Little Gull, Great Black-Backed Gull, Black Legged Kittiwake, Caspian Tern, Common Tern, Forester's Tern, Northern Rough-Winged Swallow, Cliff Swallow (hunts over open water of rivers and lakes), American Coot, Osprey, Eared Grebe, Red-Throated Loon, Ruddy Duck, Red-Breasted Merganser...and many more.

<http://www.lakemetroparks.com/birding-blog/april-2017/the-marvels-of-migration>

## THE MARVELS OF MIGRATION

- POSTED APRIL 27, 2017  
By: John Pogacnik, Biologist

I spent a couple hours at Lake Erie Bluffs this morning at the top of the 50-foot observation tower at the Clark Road entrance. The tower offers a distant view in every direction. Gusty south winds and warm temperatures were predicted, so I knew a lot of birds would migrate today. I was not disappointed--I watched 72 species of birds fly over land and over Lake Erie.

We are very lucky to live along Lake Erie. There are very few areas in this country where you can experience bird migration taking place at the level we get. Anywhere you have a major coastline you can expect great bird migration because birds do not like to cross large bodies of water. There really is nowhere to hide if they run into predators, so they end up following

the coasts and concentrate in large numbers. It's not a surprise that the Magee Marsh Wildlife Area in Northwest Ohio and Point Pelee Park in Ontario are among the top places in the world to bird. Both areas attract people from across the country (and even the world) to experience spring migration due to their locations along the shorelines. For the same reason, Lake Erie Bluffs sees some spectacular bird numbers.

The main migrants this morning were blue jays. There were several flocks that numbered between 500 and 800 birds. Blue jays breed locally and can be found throughout the year in Ohio. Every year, birds from the northern part of their breeding range head south for the winter. The last week or two of April and the first couple weeks of May we see them heading north along the lake. Pick a day with a south wind and get up to the lake and you won't be disappointed. I counted 8,770 blue jays and I missed a lot because I was looking at other things. When you see a flock of say 500 blue jays, you break the flock into groups of 50 and count them that way.

Another bird in high numbers was the red-bellied woodpecker with 17 birds seen flying east along the lake. Why this is significant is that most birders think of red-bellied woodpeckers as not being migratory. Like blue jays, some leave the northern part of their breeding range. Unlike blue jays that migrate every year, the woodpeckers migrate every other year. When I used to band along the lake, we saw spikes every other year with red-bellied woodpeckers, black-capped chickadees, tufted titmice, white-breasted nuthatches, hairy and downy woodpeckers and northern cardinals. Evidently, whatever food they feed on is cyclical and they move south every other year in small numbers. We see similar trends on the Lake Erie Island Christmas Count. Every other year small numbers move south. Tufted titmouse, a common bird throughout Ohio, is rare on the islands. In the nearly 30 years of doing that bird count, we have seen titmice about ten times and always only a few birds at most.

There were also good numbers of herons flying by today. Twenty-six great blue herons, nine great egrets and the most exciting birds seen today were a pair of cattle egrets in breeding plumage. Cattle egrets are native to Africa. They spread to South America in the 1870s. Prior to 1952, they were unknown in North America, but have spread rapidly and can be found throughout North America. A small number breed on West Sister Island in the western end of Lake Erie. They are occasionally seen throughout Ohio in migration.

<http://www.hww.ca/en/wildlife/birds/blue-jay.html>

The Blue Jay, which occurs from southern Canada south to Texas and Florida, is only a straggler on the open plains. It breeds in the mixed-wood forests of central Alberta, Saskatchewan, and southern Manitoba, and from there east through central and southern Ontario to southern Quebec, the island of Newfoundland, New Brunswick, Prince Edward Island, and Nova Scotia. In the northernmost part of its range it may be seen with the Gray Jay *Perisoreus canadensis*, a bird that breeds much farther north to the tree line. In central Florida the Blue Jay coexists with the Scrub Jay *Aphelocoma coerulescens*. The Steller's Jay *Cyanocitta stelleri* replaces the Blue Jay west of the Rockies and is fairly similar in general habits. This bird is the "blue jay" to the people of British Columbia. Prince Edward Island and British Columbia have selected the Blue Jay and the Steller's Jay, respectively, as their provincial birds.

The Blue Jay is partially migratory, withdrawing several hundred kilometres in some winters from the extreme northern parts of its range. It migrates quietly by day, usually in loose flocks of 5 to 50 or more. Occasionally up to 3 000 migrants have been seen in one day at Point Pelee National Park where Blue Jays congregate before crossing Lake Erie.

[W. Bryant Tyrrell](#) (1934) describes a striking assemblage of jays at Whitefish Point, Mich., which were preparing "to cross the eighteen miles of Lake Superior to the Canadian shore"--a favorable migration route. He says:

Extending south, back of the dunes--along the Lake Superior shore, is a wooded region composed mostly of Jack pine, broken by small swampy areas. In this wooded region the birds [of various species] congregate by the thousands before migrating north across Lake Superior. It was in these Jack pines that I saw hundreds--if not thousands--of Blue Jays (*Cyanocitta c. cristata*) on the morning of June 5, 1930. It was a dull cloudy morning with a chilly northwest wind blowing off Lake Superior. When we arrived at the Point, soon after daylight, the birds, mostly Blue Jays. . . were exceedingly restless, apparently waiting to go north but not caring to venture across in a northwest wind. The Blue Jays made very little noise but were constantly milling around, usually in flocks of varying size. A flock would form and fly off towards the lighthouse, circling and rising all the time until they were over the lighthouse several hundred feet high. They would continue to circle and then would come quietly but quickly back to the pines, only to repeat the same procedure in a short while. By the middle of the morning they had broken up into small flocks and gone off into the woods for the day to feed, congregating again in the evening. Each morning the same maneuvers took place until the morning of June 11 when the wind changed to the northeast and the weather became much warmer. On this date the birds were again circling, though flying so high that at times they were almost out of sight. I did not see a single flock actually start and fly off across the lake, but on the morning of the 12th there was hardly a bird to be found in the Jack pines.

## MORE DAMAGING INFORMATION REGARDING FEDERALLY LISTED SPECIES THAT MAY BE AFFECTED

The BA indicates that five federally listed species may be affected by the proposed project. These include: • Indiana bat (*Myotis soda/is*)- Endangered • Northern long-eared bat (*Myotis septentrionalis*) - Threatened • Kirtland's warbler (*Setophaga kirtlandii*) - Endangered • Piping plover (*Charadrius melodus*)- Endangered • Rufa red knot (*Calidris canatus ru/a*)-Threatened

### *And now USFWS Dan Everson's summary:*

*SUMMARY As detailed above, DOE has determined that LEEDCo's Project Icebreaker is not likely to adversely affect Indiana bat, northern long-eared bat, piping plover, rufa red knot, and Kirtland's warbler. The Service concurs with these determinations. This concludes consultation on this action as required by section 7(a)(2) of the Endangered Species Act. Should, during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be reinitiated to assess whether the determinations are still valid.*

*It is our view that additional **information is available** and that a new assessment in the form of an EIA should be applied.*

Please also note that bats are notably killed in mid air as their lungs explode from the pressure variation near the tips of the turbines. Bats are attracted to wind turbines as possible roosting or resting stations. Applying collision data collection technology to the turbines will do nothing at all to mitigate the loss of bats, where even one loss of a female, can

adversely impact an entire family or roost/colony. Some of these losses are clearly unable to be “mitigated.”

It is our submission that evidence and information is abundant enough to require a complete EIS. Poorly designed and inadequate studies provided by the developer, do not support advancement of this proposal. We further express concern that the developer appears to show scant understanding of the world wonder of migration at Lake Erie, and even denies that it occurs over the Lake. This is unacceptable.

We understand the PUCO Staff report of a few days ago supports in essence the MOU requirements as being met, with some caveats and going forwards. We again respectfully request re examination of the points raised in this letter. As a minimum, the Icebreaker MOU responses should be questioned once again, and assurances of more complete and sincere replies be required. Once given in full, the evidence will only point in one direction: no turbines in Lake Erie.

Sincerely yours,

*Sherri Lange*

*CEO North American Platform Against Wind Power*

*Executive Director Canada, Founding Member, Great Lakes Wind Truth*

*Executive Director Canada, Save the Eagles International*

[www.na-paw.org](http://www.na-paw.org)

*Al Isselhard*

*Wolcott, NY*

*Principal and Founding Member of Great Lakes Wind Truth*

*Suzanne Albright*

*Principal and Founding Member of Great Lakes Wind Truth*

*Member, Save the Eagles International*

[www.greatlakeswindtruth.org](http://www.greatlakeswindtruth.org)



**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/9/2018 4:50:26 PM**

**in**

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

Summary: Public Comment electronically filed by Docketing Staff on behalf of Docketing.