

Public comment 16-1871

From: jvician@com [<mailto:jvician@com>]
Sent: Monday, September 17, 2018 11:54 AM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Cc: DNR Wildinfo <Wildinfo@dnr.state.oh.us>
Subject: Icebreaker Project

This project that will bring green energy to Ohio from available wind in Lake Erie is a most important one. It is the first of what will be very important clean energy projects to the region and especially to the Ohio region. It always takes a trailblazer to do new and very good things and this is it.

I strongly recommend the project be approved without costly restrictions so it may bring many benefits to your state. You will not find a more experienced project developer that has invested its time and funds in bringing the best-in-class projects to you.

It would be a shame if Ohio lost this opportunity to be at the forefront of this exciting technology.

Best regards,

James J. Vician

-----Original Message-----

From: Ronald Stach [<mailto:rlfstach@me.com>]

Sent: Monday, September 17, 2018 10:35 AM

To: Puco ContactOPSB <contactopsb@puco.ohio.gov>

Cc: DNR Wildinfo <Wildinfo@dnr.state.oh.us>

Subject: # 16-1871-EL-BGN

Please approve the agreement between Icebreaker and the other involved parties as soon as possible.

I am an ardent lover of nature and wildlife, and the bureaucratic demands being imposed on this project are in my opinion both unreasonable and obstructionist. The due diligence has been done, and at this point it's pretty clear that those trying to stop this project, now through politics and public policy, are simply protectionists trying to take us backwards, not forwards. For once, make Ohio a progressive, forward-thinking place that has our children's future at heart.

From: Brent Eysenbach [<mailto:brent.eysenbach@gmail.com>]
Sent: Monday, September 17, 2018 8:06 AM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Cc: DNR Wildinfo <Wildinfo@dnr.state.oh.us>
Subject: Case # 16-1871-EL-BGN

As a resident of Cleveland Ohio I am writing to ask that the OPSB approve the agreement between Icebreaker and the other parties to the case and issue a Certificate as soon as possible.

Northeast Ohio needs to begin producing clean energy.

Thank you for your consideration.

Brent A. Eysenbach
1267 W. 103rd Street
Cleveland, Ohio 44102

From: salbright2@aol.com [<mailto:salbright2@aol.com>]
Sent: Sunday, September 16, 2018 10:59 AM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Cc: DNR Wildinfo <Wildinfo@dnr.state.oh.us>
Subject: comments regarding Case# 16-1871 Icebreaker Wind, Inc.

Good Morning,

Fall migration over Lake Erie is well known and extensively documented regarding songbirds, waterfowl, and raptors. Their devastation, injury and slaughter if the Icebreaker project is allowed to be constructed in Lake Erie is no secret. However, there has been little attention given to the same devastation that could fall upon migrating Monarch butterflies. I received these comments from a friend on 9/15/2018 via email:

"I was a witness to this big Monarch Butterfly migration this morning coming off of Lake Erie at the western Erie County, PA lakeshore park called Lake Erie Community Park (it is located about 9 miles from the PA and OH border). It is in Girard Township, PA and this part of the lake is considered the central basin which includes the area from Port Clinton, Ohio to Erie, PA.

-Another witness of this Monarch migration was a friend of mine WC who joined me for approx. the last 35 minutes of the observation period that ran from 8:15 am to 10:01 am.

- In total we counted 1,642 migrating Monarch Butterflies. I counted by myself 1,015 migrating Monarchs between 8:15 am and 9:15 am. W.C. joined me sometime during the last 35 minutes ending at 10:01 am and we counted together 627 migrating Monarchs from 9:16 am to 10:01 am."

Although not scientific, his observations can **NOT** be ignored! Further review of the literature regarding Monarch migration over Lake Erie reveals:

Monarchs Over Lake Erie Waters Citizen Scientist Observations, October 14, 2015: ...In addition to evidence reported in the Lake Erie islands, there are reports along the OH shoreline further east of the islands and on the water as well. Jen Brumfield, a naturalist with Cleveland Metroparks, reported a large roost of 4000 monarchs gathered at Wendy Park on Whiskey Island on the evening of September 12, 2015. Wendy Park is located directly on the southern shore of Lake Erie near downtown Cleveland, and has long been known by area residents as an annual stopover site for migrating monarchs. Brumfield reported "...After crossing Lake Erie, thousands upon thousands of the dazzling butterflies arrived on Ohio shores to meet a powerful cold front pushing along the lakefront. High winds and rain forced an extraordinary number of monarchs to seek shelter from the inclement weather." Interestingly, monarchs gathered at Wendy Park ahead of the same storm and strong west winds that led to the roost formation on South Bass Island that this author documented that same night. Approximately 4000 monarchs also formed several roosts at the tip of Point Pelee that evening.

Jen Brumfield often leads boat tours on Lake Erie searching for rare birds. Brumfield reported her monarch observations, explaining "Many, many times I have witnessed monarchs moving over the lake and coming ashore. On the 5th of September 2015, I ran a boat trip off of Port Clinton that covered open water around the Lake Erie islands. I observed 50+ monarchs that day. On September 16, 2015, I counted 250+ monarchs on a 70-mile offshore survey off Vermillion and Huron. The monarchs were anywhere from 5 to 13 miles offshore, and winds were very light from the southwest (virtually no wind).

Also from this post: Based on observations by myself and naturalists in the Lake Erie islands, and reports from other citizen scientists in the region, it is clear that monarchs do cross the open waters of Lake Erie. They do so during the summer, as well as in the fall. They are most often seen flying at 20-60 feet above water, but reports of flight altitude range from 8-100 feet above water. Since most observers cannot see beyond a height of 300 feet above them, it is not clear if monarchs may be migrating over the lake at higher altitudes. ***Glider pilots have seen monarchs at 10,000 feet, and helicopter pilots servicing oil rigs in the Gulf have seen them at 1000-1200 feet. Are monarchs flying at altitudes over 300 feet above Lake Erie? More evidence is needed. Mark Shieldcastle, Research Director for the Black Swamp Bird Observatory, recently reported seeing monarchs fly onshore from Lake Erie routinely at 100 to 200 meters altitude, along the Magee Marsh beach area on the southern shore of Lake Erie. Additional reports such as this will provide valuable information for understanding the altitude of the monarch migration over Lake Erie.***

A post shared by Gabe Leidy on 9/08/2018: There are currently ~1000 Monarch butterflies roosting around Wendy Park/Whiskey Island, Cuyahoga Co. These butterflies crossed Lake Erie yesterday on their journey to Mexico, but the current weather conditions have them grounded here.

In fact, the USFWS has published information regarding threats to Monarchs that already include deforestation, illegal logging, agricultural expansion, forest fires, and other sources of habitat loss. Are the OPSB and ODNr prepared to give LEEDCo and Fred Olsen permission to cause further risk and death to Monarchs? Where is the research from LEEDCo and Olsen that proves "no harm" to these majestic butterflies as they migrate across Lake Erie? As this project attempts to move forward in the permitting process, it becomes increasingly obvious that the horrific consequences to wildlife and thus the environment that will most likely occur far outweigh any minuscule amount of intermittent, unpredictable energy it might produce. Please, for the sake of innocent wildlife that cannot defend themselves, do not allow this experimental project to be built in Lake Erie.

Respectfully submitted,

Suzanne Albright

Great Lakes Wind Truth

-----Original Message-----

From: Chris [<mailto:saxbabe@aol.com>]

Sent: Saturday, September 15, 2018 7:43 PM

To: Puco ContactOPSB <contactopsb@puco.ohio.gov>

Subject: 16-1871-EL-BGN

Dear Sirs:

Please put a stop to LEEDCO's Icebreaker Lake Erie project, Case # 16-1871-EL-BGN.

It is not clean, and will do extensive damage to aquatic environment. Please DO NOT APPROVE the agreement between Icebreaker and the other parties to this case. Deny a certificate for the sake of the environmental health of Lake Erie, and the rest of the Great Lakes, the largest source of fresh water on this whole planet Earth.

This Demonstration Project should not be allowed to proceed for the toxic waste that will be created from the construction and operation of these industrial wind turbines. There is not only harm to aquatic life but migratory birds and waterfowl, as well. This is the wrong place.

Sincerely,

Christine Bronson

-----Original Message-----

From: John Kitto [<mailto:kittojb@gmail.com>]

Sent: Saturday, September 15, 2018 3:13 PM

To: Puco ContactOPSB <contactopsb@puco.ohio.gov>

Cc: DNR Wildinfo <Wildinfo@dnr.state.oh.us>

Subject: Icebreaker Project Reference Case #16-1871-EL-BGN

Dear OPSB and Ohio Dept. of Natural Resources It is critically important for the OPSB and the Ohio ODNR to approve the agreement between Icebreaker and the Ohio Environmental Council, Sierra Club and other parties, as well as grant the Certificate for this 6 turbine demonstration project as soon as possible. This project is critical to diversity of energy supply, expansion of clean renewable energy and economic development/jobs in Northeast Ohio. This project has gone to great lengths to minimize its impact on the environment while opening the economic and energy potential in this growing field. Please issue the Certificate as soon as possible for Icebreaker (Case # 16-1871-EL-BGN).

Very truly yours,

John B. Kitto, Jr. PE (Ohio)

1225 Arrowhead Dr SW

Dellroy, OH 44620

kittoj@asme.org

Sent from my iPhone

-----Original Message-----

From: Susan Dudley [<mailto:s.dudley92@gmail.com>]

Sent: Saturday, September 15, 2018 9:57 AM

To: Puco ContactOPSB <contactopsb@puco.ohio.gov>

Cc: DNR Wildinfo <Wildinfo@dnr.state.oh.us>

Subject: wildinfo@dnr.state.oh.us

To whom it may concern:

Please deny any and all applications by LEEDCO to build the Icebreaker project in Lake Erie.

Do not jeopardize one of our fresh water resources and the migratory bird flyway for thousands of birds with this travesty under the guise of 'green energy'. These turbines will be obsolete within five-ten years as solar and battery power are improved.

Transferring the tiny amount of electricity generated by any wind turbine is extremely difficult and not profitable.

Leedco will abandon them for the state of Ohio to clean up or watch rot into the lake.

LEEDCO is merely trying to collect a lot of 'free' money provided by US tax payers.

They do not care if this project actually benefits anyone other than LEEDCO.

Sincerely

Susan Dudley

From: Jeff Downs [<mailto:jrd5838@gmail.com>]
Sent: Friday, September 14, 2018 8:59 PM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Cc: DNR Wildinfo <Wildinfo@dnr.state.oh.us>
Subject: ICEBREAKER

The idea of permitting a wind turbine demonstration project in Lake Erie has always been a very steep climb. Especially when it was initially proposed. Through the tireless efforts of a tiny staff and the dedicated army of volunteers LEEDCo has answered the concerns of the environmental community not once but repeatedly. They have won the support of Cleveland's business and civic leaders. And perhaps their most impressive achievement of all to date persuaded thousands of potential customers to agree to pay more for their electricity.

Cleveland, a city that suffered through so many difficult years, is poised to become a leader in an industry who's time has come. I urge you to support Project Icebreaker. As a lifelong Clevelander my children and grandchildren deserve it.

From: Rick and Mary Hamilton [<mailto:grhmkh@att.net>]

Sent: Friday, September 14, 2018 8:43 PM

To: Puco ContactOPSB <contactopsb@puco.ohio.gov>

Subject: Icebreaker Wind Project

Concerning Project Icebreaker

I have lived in the Cleveland area across 7 decades and own a home in the West Park neighborhood. I have been a resident of Cleveland for 45 years. The completion of the first offshore, freshwater wind farm in North America will put Cleveland and Northeast Ohio at the forefront of the critically important clean energy economy.

LEEDCo, the regional, nonprofit, economic development organization leading the project, won a \$40 million commitment from the Department of Energy, which has led to private investment from Fred.Olsen Renewables (FOR), the UK's largest independent wind power developer. Olsen Renewables has created FORUSA and Icebreaker Windpower Inc., with headquarters in Cleveland.

Project Icebreaker will create jobs and make use of our region's strengths in manufacturing and technological innovation, while improving the quality of life for area residents by reducing harmful air and climate pollution, as well as toxic mercury emissions into Lake Erie.

Don't let citing restrictions hamper this important project by limiting nighttime operation. I spent years sailing on Lake Erie, sometimes in the proposed cite. The nighttime, offshore breeze will be a critical factor in driving the success of this project. Icebreaker has developed a sampling plan in conjunction with state and federal wildlife agencies and OSU's Stone Lab to measure a variety of environmental factors and will be a "science lab" to study the impacts of offshore wind in the Great Lakes on birds, bats, and aquatic resources. Project monitoring will be done after construction to ensure that the wind turbines are in fact having minimal impact.

Icebreaker will position Northeast Ohio as a national leader in the production of offshore wind energy, as it serves as an industry technology and environmental research center and provides a model for future freshwater offshore wind projects. Icebreaker can help make Northeast Ohio the epicenter of offshore wind development by creating manufacturing, engineering, operations and maintenance jobs and bringing new investments to the region.

The power produced by Icebreaker will be used locally. Cleveland Public Power has committed to purchasing 2/3 of the power produced, a portion of which will be sold to Cuyahoga County. Icebreaker will produce clean electricity — enough to power the equivalent of around 7,000 homes in Northeast Ohio — which will help diversify our energy mix.

I urge you to support this project, as it takes the lead in freshwater wind development and will reduce carbon pollution responsible for climate change, mercury emissions from coal-fired power plants, and take steps toward reducing pollution linked to asthma, heart attacks and premature deaths.

Rick Hamilton, 3646 W. 148th St., Cleveland, OH 44111

From: Mark Shieldcastle [<mailto:markshieldcastle@bsbo.org>]
Sent: Friday, September 14, 2018 4:35 PM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Subject: Submission RE:Case# 16-1871-EL-BGN

Please find attached comments for submission concerning Icebreaker Windpower Case# 16-1871-EL-BGN

Mark Shieldcastle

Research Director
Black Swamp Bird Observatory
Oak Harbor, Ohio
419-898-4070 (Ext. 202)

[BSBO WEBSITE](#)

[FACEBOOK](#)

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BLACK SWAMP BIRD OBSERVATORY

13551 W. State Route 2 ♦ Oak Harbor, Ohio 43449 ♦ 419-898-4070 ♦ www.bsbo.org

TEAMING RESEARCH WITH EDUCATION TO PROMOTE BIRD CONSERVATION



September 14, 2018

Ohio Power Siting Board
Docketing Division
108 Broad Street
Columbus, OH 43215-3797
By email: contactOPSB@puc.state.oh.us

Re: Case# 16-1871-EL-BGN

Dear Ohio Power Siting Board:

This letter is in response to the "Joint Stipulation And Recommendation" filed by Icebreaker Windpower, Inc., et. al., on Sept. 4, 2018, which are recommendations to modify the Conditions put forth in the OPSB "Staff Report of Investigation" dated July 3, 2018.

We wish to make our understanding clear from the outset that the Avian and Bat MOU as a whole is the primary condition for beginning construction, and that the Conditions set forth in the Staff Report are supplementary to, not replacing or superseding, that MOU. Therefore, as stated in the MOU on p. 3, Sect. C., "Prior to the date of construction...post-construction protocols in the (Avian and Bat Monitoring) plan will be finalized and approved through written communication with the ODNR." While this certainly cannot be ignored it has not been addressed directly in the Stipulations document. There is at this point no approved Avian and Bat Monitoring Plan for Post Construction.

Further, we take issue with some of the many modifications recommended in the Stipulations, since we see them as being contrary to good ecological science or contrary to the intent of the Staff Report for the reasons detailed as follows:

Condition 18. The Applicant has changed the word "acceptance" found in the Staff Report to read "confirms compliance." This sidesteps the issue of the effectiveness of the avian and bat mitigation plan being required by the condition. Compliance merely means that a mitigation plan has been submitted, but acceptance by ODNR and Staff means that the plan itself is acceptable because it is expected to be effective. By changing the wording of Condition 18 it has been made meaningless.

Condition 19. There are a number of shortcomings in this Condition which are worthy of discussion. First, the Condition calls for a “collision” monitoring plan. This has been discussed elsewhere as a “thunk” detection technology. This technology only detects actual collisions, but does not address the fact that many, if not most bat fatalities do not involve actual collision with the turbine, but are rather a result of barotrauma resulting from pressure differentials around the turning blades. It has been reported that as much as 90% of bat fatalities from wind turbines may be due to barotrauma that would not be detected by “collision” technology. (Baerwald, Erin F., et.al., “Current Biology,” Vol. 18, Issue 16, pp. R695-R696.) Second, the wording in this Condition has been changed from (paraphrasing) “feather until monitoring is proven” to “monitor until monitoring is proven effective, and feather if indicated.” This is not a small change in the logic of a scientific plan, and the implications are that mortality will be allowed until it can be shown that mortality can be proven. The Staff report took the position that mortality should be avoided (by feathering) until it can be proven that mortality can be reliably detected. This would appear to be the more logical way to proceed, given that developing the detection technology itself is one of the primary obstacles/goals of this project, and has been an open-ended issue from the beginning of this project. In his comments to the OPSB dated 06 Sep 2018 Mr. Karpinski, of LEEDCo, mentions in this regard an “accepted and proven” technology, but the fact of the matter is that such technology simply does not yet exist. Third, it should be recognized that birds are vulnerable to stationary objects like towers and feathered turbines as well as to turning blades. So, while feathering may mitigate bat mortality, it may not have a similar effect upon bird mortality. Until a proven detection method is employed the effect of feathering on birds and bats will remain unknown.

Condition 22.(a). It should be noted here that a large number of migrant passerine species have been shown in our research to weigh less than 10 grams, and their detection would not be required by the Condition as stated since it only requires a ≥ 10 gram detection limit. This is a major shortcoming in this Condition. We recommend a detection limit of >4 gram instead so that the presence of migrant passerines is not missed due to an ineffective detection limit.

Condition 22.(c). The wording change concerning survey time producing viable data from “80 percent...including...high seas events” as found in the Staff Report to “80 percent...unless precluded by...high seas events” clearly corrupts the intent of this condition. It is important to note that the very weather conditions which might prevent radar operation on the barge due to high seas are the same conditions which would promote migration flight at low altitudes due to low cloud cover. The change to this Condition would then preclude important migration events from radar monitoring, and would then underestimate migration volumes. This wording change may be prompted by the Applicant’s having chosen the less expensive radar mounting option of a floating barge, rather than a fixed platform; but that is no good reason to allow the collection of required data to suffer. If the less expensive choice cannot fulfill the purpose of collecting adequate data then it is simply not a viable choice for doing so.

Condition 22.(g). The Condition was modified to remove the phrase “to determine behavioral changes” from the Staff Report and replace it with stipulations that negate the purpose of collecting data. Behavioral changes cannot be detected over the span of only one year – one year must be compared to another to determine if behavioral changes are being exhibited, meaning that a minimum of two years of data collection are required to fulfill the purpose of adequate comparison. In fact, what is missing from even the Staff Report’s version of this Condition is the option for ODNR to require additional years of data collection beyond the minimum of two if the data suggest that more information is needed to address the issue of behavioral changes resulting from the presence of turbines. That being said, we

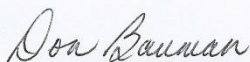
recommend that the Condition require a minimum of three consecutive years of monitoring in order to collect sufficient data for statistical analysis of migration at the project site.

Condition 23. The Applicant has changed the word “acceptance” found in the Staff Report to read “confirms compliance.” This sidesteps the issue of the acceptability, i.e., the scientific veracity of the radar monitoring plan being required by the condition. Compliance merely means that a monitoring plan has been implemented, but acceptance by ODNR and Staff means that the monitoring plan is expected to actually fulfill its purpose. By changing the wording of Condition 23 it has been made meaningless.

Condition 24. There are a number of issues with The Stipulation in this Condition. First, the Stipulation inserted the parenthetical phrase beginning “i.e., biologically significant impact on the population level...” to modify the meaning of “significant adverse impact” found in the Staff Report. This modification is in direct disagreement with the intent of both the Migratory Bird Treaty Act and the Endangered Species Act which, by definition, does not differentiate between population effects and individual effects (e.g., take). Second, the Stipulation changes wording from the Staff Report to be “Applicant will develop and submit a mitigation...” rather than the original “adaptive management shall be prescribed to the Applicant...” if the project is producing significant adverse effect upon species covered in the MOUs. It would seem imprudent to leave it up to the Applicant to singularly devise a revised monitoring plan since they have an inherent conflict of interest. Third, nowhere in this Condition does it address the issue of continuing or halting operations when the project has been seen to result in significant adverse effects to species. This seems to be a major omission and we recommend it be addressed.

We at BSBO appreciate the opportunity to publicly comment on the science involved in this project since it is intended to be sited in a Globally Important Bird Area known world wide as a major avian migratory crossover route used by millions of birds every year. The potential for damage to the avian species present is enormous and should be given a much higher priority by the Applicant. Clearly this is a pilot project in this regard since the ecological science of evaluating and monitoring avian risk in an offshore wind environment is almost nonexistent, and so deserves to be approached cautiously.

Sincerely,



Don Bauman

Chairman, Conservation Committee
Member, Board of Directors
Black Swamp Bird Observatory



Steve Holmer

Vice President of Policy
American Bird Conservancy

From: Daniel Hribar [<mailto:djhribar915@yahoo.com>]

Sent: Friday, September 14, 2018 2:24 PM

To: Puco ContactOPSB <contactopsb@puco.ohio.gov>

Cc: DNR Wildinfo <Wildinfo@dnr.state.oh.us>

Subject: Case #: 16-1871-EL-BGN

To whom it may concern:

I am writing today with regard to the LeedCo Icebreaker Wind Project that will be brought before the Ohio Power Siting Board exactly 10 days from now in Ohio's capital. As a life long resident of NE Ohio (Euclid), I have become very passionate about my community and about Ohio as a whole. I am proud to hail from the Midwest, and I want to see my state become the population hub that it is destined to be. I also want to see my state become a leader in a changing country and world, particularly in the realm of renewable energy. In Cleveland, our motto is a "green city on a blue lake". I believe in that motto, and I want nothing more than to see my city thrive through embodiment of that maxim.

But once again, progress is being stalled by unrealistic regulatory provisions and government bureaucracy. I have followed the LeedCo project since it was first proposed for Cleveland's offshore waters in Lake Erie, and I have been hopeful since its inception that it would come to fruition. But now that hope is being thwarted. As an environmental scientist, I well understand the potential impacts to avian biota given the proposed wind farm's placement along an important migratory corridor. But I also understand that we are losing species at unprecedented rates due to a warming world, a threat far greater than any posed by six wind turbines. Moreover, LeedCo has been upfront and willing to compromise throughout the process, already agreeing to nearly 50 stipulations outlined in the July 3rd OPSB report. A monitoring plan in place for bird and bat strikes is important and justified. But foregoing the entire project over the issue would be foolish and would only further perpetuate the status quo in a state becoming left behind in the ongoing energy grid transition.

As such, I am voicing my support for the Icebreaker wind project and asking that you do the same by approving an agreement between all parties to the case and issuing a certificate as soon as possible. It's almost 2020, and it's time that Ohio started taking and making strides towards a more sustainable future. This wind farm would be a monumental accomplishment and unlike any such projects before it. Let's make that happen and put Ohio in the spotlight for the right reasons!

Thank You,

Daniel Hribar
The Ohio State University
Environmental Science
Cell: (216) 466-1538
Email: Hribar.17@osu.edu

Stop Icebreaker now > The Icebreaker demonstration project is environmentally harmful and will prove devastating to the ecology of Lake Erie, part of the earth's fragile fresh water bodies that has to be preserved. Not only will the dredging and disturbance of the lake bed be harmful, but the presence of these wind turbines will prove deadly to migrating birds, bats, and monarch butterflies. These facts have been well documented and cannot be ignored. The project will pave the way for thousands more IWTs in the lake, spawning catastrophic long-term ecological consequences. Please do not allow LEEDCo a certificate.

Christine Bronson
9533 Somerset Drive
Barker, New York 14012
(716) 795-3174
saxbabe@aol.com
ref:_00Dt0GzXt._500t0BqhyW:ref

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in

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

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