

----- Forwarded Message -----

From: [nolakeeriewindturbines@aol.com]

Sent: 2/27/2019 4:54 PM

To: contactopsb@puco.ohio.gov

Subject: Comment to OPSB Case Number 16-1871-EL-BGN Icebreaker Lake Erie Wind Turbine Project

To: Members of the Ohio Power Siting Board

Case Number 16-1871-EL-BGN Icebreaker Lake Erie Wind Turbine Project

Currently there are giant ice floes on Lake Erie that are crashing into the shoreline of Lake Erie. Below is a photo from the Buffalo News showing a giant ice sheet crashing into a Lake Erie shoreline home in Hamburg, NY. And below this photo are links on this Lake Erie story from the Buffalo News, Cleveland Station WKYC TV, and the Dunkirk Observer News. I am sending this material to the OPSB to show the impact of Lake Erie ice floes which could have a devastating effect on the subject wind project.

I want to inform the Board that the serious effects of giant ice forces on the Icebreaker industrial wind turbines has not been fully investigated by the staff of the state agencies reviewing this project. But it was the responsibility of the developers LEEDCo and Norwegian company Fred.Olsen Renewables to provide adequate support that this project has sufficient stability to withstand these monumental ice conditions in Lake Erie. The environmental stakes are enormous with each wind turbine reported by the developers to have 404 gallons of toxic liquids and the three blades, each at 203 feet in length are made of primarily composite materials that are toxic to animal life when they disintegrate.

Please require the developer to undertake extensive tests for determining the stability of these 479 feet tall wind turbines in severe ice conditions in Lake Erie. Thank You.

Tom Wasilewski.

P.O. Box 575

Fairview, PA

Coordinator of the Conneaut, Ohio Hawkwatch.

Please see the three links below the photo below



<https://buffalonews.com/2019/02/25/hover-beach-residents-stare-down-surging-lake-ice/>

<https://www.wkyc.com/video/tech/science/amaze-lab/watch-as-this-ice-tsunami-created-from-a-windstorm-takes-over-a-beach/609-d4b225b1-2222-4ef0-a58a-97868d95e75a>

<http://www.observertoday.com/wire/?category=5025&ID=88697>

----- Forwarded Message -----

From: Sherri Lange [kodaisl@rogers.com]

Sent: 2/28/2019 11:31 AM

To: contactopsb@puco.ohio.gov; matthew.butler@puco.ohio.gov

Subject: RE Please add to Case 16 1871 EL BGN

Hello Mr. Butler

Can you please add these documents to the Case as in the subject line?
Icebreaker Wind-power Inc.

Thank you!

Best wishes,

Sherri

Sherri Lange

CEO, NA-PAW, North American Platform Against Wind Power

Executive Director, Canada, Great Lakes Wind Truth

VP Canada, Save the Eagles International

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www.na-paw.org

Twitter: #torwinaction

Aaron Van Ooteghem <aaron_van_ooteghem@hotmail.com>

To: Mary.mertz@dnr.state.oh.us, Steven.gray@dnr.state.oh.us

Feb. 27 at 7:12 a.m.

Please accept this objection to the Icebreaker wind turbine project in Lake Erie.

I have been a life-long resident on the north shore of Lake Erie in the former townships of Houghton and South Walsingham, in Norfolk County, Ontario, Canada.

The rationale for building wind turbines has proven to be faulty. So there is no good reason to proliferate this problematic technology and risk and destroy Lake Erie environments and the people and wildlife that use them. The project is a threat to the water quality and will slaughter birds and bats.

Globally the wind turbine industry and governments are failing to mitigate the damages that wind turbine projects are causing. In Ontario, our new premiere is struggling to deal with the reality that people including children are being harmed by neighbouring industrial wind turbines. It is known that noise emissions regulations do not protect health and are based on faulty engineering models. Wind turbine contracts are being traded internationally on false premises.

Here in Ontario, Canada our governments do not allow wind turbine projects in the Great Lakes. We share this lake and do not want anybody, on either side of the border to endanger it.

I urge you to prevent the Icebreaker atrocity from going any further.
Thank-you.

Aaron Van Ooteghem
Clear Creek, Ontario, Canada

Dear Ms. Mertz and Mr. Gray,

RE: ICEBREAKER WINDPOWER INC. OPSB CASE #16-1871-EL-BGN

We are writing with respect to a massive wind project consisting of firstly six then thousands of industrial wind turbines planned to be stuck into Lake Erie, 6-8 miles offshore of Cleveland, which as you know, is just a relatively short trip across the lake for all sorts of birds, Tundra Swans, raptors, Monarch butterflies and many other winged creatures from Ontario, Canada, where we reside.

To be blunt, and with respect, this project represents sheer insanity given everything we know (or people ought to know) by now about the utter failure of the wind power industry around the world to deliver what it promises. Consider these main indisputable facts:

- Wind turbines cannot exist and are not economically feasible without taxpayer subsidies.
- Wind turbines contribute next to no electricity, are obviously and by nature unreliable, requiring standby back-up of the very fossil-fuel energy sources they are supposedly trying to replace.
- Wind turbines are a thousand times more environmentally destructive than any good it is fake-green-claimed they do for the non-existent problem of supposedly runaway manmade global warming.
- Wind turbines kill birds and bats on an unsustainable, industrial scale.

In short, there should be a world-wide moratorium on industrial wind turbines, both in and out of the water. Even if they had any redeeming value, which they most emphatically do not, situating many thousands of them in the waters of Lake Erie would be to cause willful slaughter of millions of birds and bats as well as inconceivable, perhaps irreversible degradation of the aquatic environment.

We've been concerned for years about the useless wind turbines defiling the pastoral Ontario landscape and the beautiful shorelines along the Great Lakes, and especially those forced into designated Important Bird Areas such as at Grand Bend, Ontario on Lake Huron.

Do the environmentally and responsibly right thing by rejecting this project. Don't do it. Don't cave in to the international climate industrial complex and its dishonesties and corruption - just don't.

Your friendly Canadian neighbours,

Carmen von Richthofen, Toronto, Ontario

<https://wolfhill.blog>

<https://vimeo.com/channels/protecttundraswans/>

February 21, 2019

RE: SIX TURBINE PROPOSAL OFFSHORE AT CLEVELAND,
ICEBREAKER WINDPOWER INC. OPSB CASE #16-1871-EL-BGN

Dear Ms. Mertz and Mr. Gray,

We are writing to you regarding the proposed six wind turbine project, really 1400 to 1700 plus, now called Icebreaker Windpower, 6-8 miles offshore of Cleveland. We are profoundly concerned, but hopeful now that Governor DeWine and a refreshed PUCO are in place. We are sending our congratulations.

In all truth, we need a complete moratorium for the Great Lakes, as Ontario, Canada has enacted. This would safeguard drinking water for tens of millions both sides of the border, and ensure that the contaminants within the turbines, including more than 400 gallons of oil and lubricants in each turbine which leaks and has to be replenished, carbon fiber blades that cannot be recycled, toxic rare earth elements from China in the magnets, and a compendium of other metals and plastics, also most of which will most likely be left in situ after a very short life span of producing next to nothing. (To date, the public and supporting legislators of the US and Canada have achieved five Canadian side moratoria including the 2011 Ontario offshore moratorium, the end of the NY State GLOW {Great Lakes Offshore Wind} project proposal, a recently withdrawn Galloo Island offshore island proposal by Apex, a defeated LEEDCo project 2014, now morphed into Icebreaker with a new design and new Case number a FOR PROFIT business instead of a 501 (C)(3).)

These actions to protect the Lakes have been achieved with a large public outrage, persistence over ten years, and the leadership of key politicians.

Other concerns for the then Liberal Ontario government (the Liberals are recently reduced to seven seats, not even enough to qualify as a Party) were about environmental impacts, bird and bat kills, water quality, fishing and boating impacts, public trust issues, and so on. Each of the studies conducted after the moratorium, 2011, showed no conclusive or positive answers for any of the questions posed, and it is now a majority Conservative government with zero interest in reviving or promoting projects **off or ON shore also**. Offshore wind power for Ontario, which skirts Lake Ontario, Lake Erie, Lake Huron, Lake Michigan and Lake Superior, and massively spread watersheds, is done, as they say, like "dinner." It has been a complete disaster economically,

environmentally, for water quality (dozens on dozens of contaminated wells), and for human health as well as having cruelly harmed and killed livestock and wildlife. There will never be an advancement of offshore wind in Ontario. It is very clear.

With respect to the Icebreaker Windpower Lake Erie proposal, there is to our knowledge, no plan proposed by the now Foreign developer, Fred Olsen of Norway, to decommission in any manner. ([The LEEDCo Draft EA](#) , 2045, 2017, calls superficially for a reversal of the installation, but this is not a “decommissioning plan.”) Indeed, **one** of the reasons Ontario, Canada refuses to remove its offshore moratorium in the Lakes is because of the lack of information on how to effectively do a decommissioning plan if it were to be needed, IF a project were successful. Which obviously to date, it has not been. (Turbines do not last 20-25 years as developers espouse. They begin to have mechanical and other failures within a few years, and often need [overhauls between years 10-15.](#))

CLEVELAND, OHIO: OHIO could perhaps benefit from the lessons of Ontario, Canada. Wind “power” in Ontario has been a disaster of enormous proportions: environmental carnage, human health degradation, water contamination in countless dozens of wells, previously pristine, a devastated economy now with the largest sub-national debt world wide.

The developer, Lorry Wagner, now President of Icebreaker Windpower Inc., who initiated the proposed six turbines off shore of Cleveland, has now sold the project, or is in the process of transferring the project, to Fred Olsen Renewables of Norway, which of course begs a few more questions. How can a multi national secure a lease for the natural resource of the lake bed for 50 years, and drain the public purse for subsidies, loans, tax advantages, etc.? Who actually “owns” this lease now is of equal concern: LEEDCo, or Icebreaker Windpower.

There are, to be succinct, many problems with the obvious foreseeable environmental impacts of this proposal. These impacts are as obvious as the nose on our face. Many of these were outlined in 2014 by then OPSB Chair Todd Snitchler, who demanded the then developer, LEEDCo, would be required to:

....(consider) objections (that) included ice throw, ecological considerations, noise, lack of appropriate technical data, as well as (address) “contradictions, biases, omissions, and minimal assessments.”

Additional serious omissions or errors were noted in the environmental review materials provided by Kerlinger and Associates on behalf of LEEDCo. Letters from ODNR and FWS indicate numerous “Contradictions, biases, omissions, and minimal assessments.” Points 19 and 20 relate to the unscientific, biased, and facile studies given

to the OPSB by LEEDCo. 19. The boat surveys monitoring birds appear to be biased relative to the results provided through the acoustic surveys. 20. It was suggested that risks to birds migrating in the project area were minimal. Based on the pelagic bird surveys conducted by the Division of Wildlife during 2011 and 2012, the results suggest that the area proposed is within areas of larger numbers of ring-billed and herring gulls. Both migrating water birds and waterfowl may be impacted by this wind facility through direct impact as well as displacement. (See the recent [NA-PAW letter and comments re the EA to the DOE here.](#))

Master Resource—A Houston based Free-Market Energy Blog—reported on the sequential objections to the project as far back as [in 2014.](#) (LEEDCo Lake Erie Wind Project: Joint Letter of Protest By Sherri Lange -- April 11, 2014)

To our view, NONE of these previously assigned corrections requirements, has been met. The omissions, errors and misrepresentations continue to this day. ABC (American Bird Conservancy) and BSBO (Black Swamp Bird Observatory) have repeatedly questioned a project at this migration site, dense as any on the planet. Additional commentators and objectors include international perspective. This is 21% of the world's remaining fresh water reserves, and as noted, one of the most intense bird, bat and insect crossing and replenishment areas world wide.

We are increasingly becoming aware of harm to birds, bats, butterflies, and all flying creatures, from on and offshore industrial wind, and now know that offshore turbines especially are eco traps, an inducement to rest, nest, and feed. This is not news any longer. Our bat populations world wide are in deep distress, from loss of habitat, loss of insect food, White Nose Syndrome, and [the largest stress to survival is now admitted to be Industrial Wind Turbines.](#) The US benefits from the presence of bats to the tune of 22.9 billion dollars per year in agricultural insect control. There are currently about 12 endangered species of bat in the US. It is impossible to outline succinctly the way these webs of existence and co-dependency positively impact each other, and us.

WHAT IS REALLLY HAPPENING, AND WHO IS COUNTING or “MITIGATING” THE DEAD, especially OFFSHORE: ALSO, A GLANCE AT THE ECONOMIC POWER OF BIRDING IN OHIO

The lakes are known habitat for numerous species both sides of the border. It is illegal to harm or displace or kill endangered bats. However, given the difficulty for developers and interested parties to count or mitigate mortality, even on shore, we still do not know how many are truly impacted, killed. We DO know that the developers are giving false numbers, and that the counts of birds and bats are **likely 95% less than what is actually**

happening. The public would truly be shocked to be offered even a sample of what is disappearing and for how long, and that some of this, even much, we would say, is not recoverable ever. To reference turbines in Lake Erie, it would be daunting to attempt to recover and count dead birds and bats who would naturally be flushed away, scavenged. It would be, frankly, impossible, unless someone was directly observing and recording within the radius and beyond, as many are “flung,” well beyond radii used now, 24/7.

[Birding is an integral part of Ohio's economic and social wealth.](#) Please remember that this multi million-dollar advantage, counted some years ago at 40 million per year in OHIO, likely much more at this time, will be adversely impacted.

Many species are at risk, endangered. Kim Kaufman of BSBO (Black Swamp Bird Observatory) indicated that:

Birds Mean Business

“From the end of April to mid-May, more than 90,000 birders visit our area to take in this astounding migration spectacle.



Birders from around the world gather at the Magee Marsh boardwalk each spring. - Photo courtesy of Black Swamp Bird Observatory

Quality of Life

Birds are colorful and active, and many sing beautiful songs. Once you delve into the world of birds, you'll also discover that their lifestyles are endlessly fascinating. Imagine a Ruby-throated Hummingbird (weighing just one-tenth of an ounce) crossing the Gulf of Mexico in fall migration, an 18 hour journey!

To date, we've had birders from every state and 32 countries here—just to enjoy “our” birds! While they're here, they spend nearly 40 million dollars in local businesses. (Data based on BSBO's post-Biggest Week economic impact study, 2013.)”

To quote Keith Stelling and Scott Petrie of Delta Waterfowl: (see NA-PAW)

Keith Stelling, Ontario naturalist, and Dr. Scott Petrie, (formerly) Director of Long Point Waterfowl, now the Senior Scientist and CEO of Delta Waterfowl, North Dakota, outline in a joint paper:

Adverse environmental effects from industrial wind turbines “Industrial wind turbines do not have a benign environmental foot print as has been claimed.

- ♣ *Biologists are observing habitat fragmentation and habitat loss, wildlife disturbance and life history disruption when turbines are placed in natural habitats.*

- ♣ *Bird and bat abundance declines at wind turbine sites and this can become more pronounced with time.*

- ♣ *Disruption of ecological links results in habitat abandonment by some species. Select Committee on Wind Turbines Submission 439 - Attachment 1, North American Platform Against Wind Power*

- ♣ *The loss of population vigour and overall density resulting from reduced survival or reduced breeding productivity is a particular concern for declining populations. (The problem with offshore is that they are magnets for flying creatures.)*

- ♣ *The cumulative effects of multiple on- and off-shore wind developments have not been considered.*

- ♣ *Collision mortality resulting from turbines and new transmission lines is increased during adverse weather conditions and migratory seasons. Especially vulnerable are raptors, passerines (songbirds), monarch butterflies, and bats. The consequential cost to agriculture from loss of pollination and natural insect control is a concern.*

- ♣ *In addition, there are serious concerns that turbine noise impacts within and between-species communications, including predator defence.*

- ♣ *Offshore installations have the added risk of causing waterfowl and waterbird displacement from feeding areas and migratory corridors, contaminant upwelling, and changes in fish communities.*

- ♣ *Placing turbines in close association with coastal wetlands can severely compromise movements and foraging of migratory waterfowl.” (Please note that observations about migratory corridors, contaminant upwelling, and changes in within-and-between species communications, including predator defence, are all relevant equally to on land turbines.) It is noted in this paper and other observers’ documents detailing the effects and impacts of wind power, that a series of mishaps, misrepresentations, omissions, and lack of consulting with local authorities, puts wildlife at undue risk. It is also the developer who does his/her own studies, pre and post mortality, and there are many instances of under-reporting, and obfuscation. It is not a fair playing field for wildlife, and certainly not for livestock, either.*

Lake Erie is one of the most resplendent and bio diverse areas world wide. The statements of the Developer(s) that flying creatures do not go across the Lake, shows a lack of basic knowledge and indicates to us a lack of sincerity and an obfuscation in favor of corporate profits; this is shocking. You will note from the excerpt below from a

transcript of a Hearing in Columbus, that the developer's expert, one of them, is scant in knowledge, or obfuscating. Shocking.

COMMENTS TO THE OPSB RE OPPORTUNITIES FOR LANDFILL; LET'S BE REAL, NOT CLEAN AND GREEN

We cannot imagine the Great Lakes becoming a wasteland of eco junk. Below are comments from a communication from NA-PAW to the OPSB.

[Wind Turbine Blades Last 20 Years](#)... And Then They Are Tossed Into Landfills Besides reducing wildlife populations, perhaps one of the most underrated negative side effects of building wind turbines is that they don't last very long (less than 20 years) before they need to be replaced. And their blades aren't recyclable. Consequently, 43 million tonnes (47 million tons) of blade waste will be added to the world's landfills within the next few decades. Liu and Barlow, 2017 "The blades, one of the most important components in the wind turbines, made with composite, are currently regarded as unrecyclable. With the first wave of early commercial wind turbine installations now approaching their end of life, the problem of blade disposal is just beginning to emerge as a significant factor for the future. ... The research indicates that there will be 43 million tonnes of blade waste worldwide by 2050 with China possessing 40% of the waste, Europe 25%, the United States 16% and the rest of the world 19%." "Although wind energy is often claimed to provide clean renewable energy without any emissions during operation (U.S. Department of Energy, 2015), a detailed ecological study may indicate otherwise even for this stage. The manufacture stage is energy-intensive and is associated with a range of chemical usage (Song et al., 2009). Disposal at end-of-life must also be considered (Ortegon et al., 2012; Pickering, 2013; Job, 2014). A typical wind turbine (WT) has a foundation, a tower, a nacelle and three blades. The foundation is made from concrete (Editor's note: in our instance with Icebreaker, steel); the tower is made from steel or concrete; the nacelle is made mainly from steel and copper; the blades are made from composite materials (Vestas, 2006; Treméac and Meunier, 2009; Guezuraga et al., 2012). Considering these materials only, concrete and composites are the most environmentally problematic at end-of-life, since there are currently no established industrial recycling routes for them (Pimenta and Pinho, 2011; Job, 2013)."

BOATING AND FISHING, RECREATION AND AESTHETICS

Recreational fishing, sailing, swimming, shoreline birding and other shore line activities are highly related to aesthetics.

Opponents are often warned by developers that the higher good, is to “save the planet,” and that turbines are part of that. (Again, this is propaganda which has been refuted now for dozens of years across the globe.) We quote John Etherington, who addresses the profound subject of aesthetics and natural wonders compromised by industrial wind in the end of his book, *The Wind Farm Scam*, now in its 13th printing.

“The Highlands are being humiliated by wind farm developers who insist they are saving the environment. They lie; they are here to make a profit. Wind farms produce very little and intermittent electricity. Most of the time they do not work. How can the blade of a bulldozer ripping up 6,000 years of beautifully preserved archaeology be saving the environment? How can the turbine blades smashing a golden eagle to bits be saving the environment? How can the government of Scotland destroy such a prize? And use public money to do it?”
(Geologist Malcolm Rider quoted by Etherington in the epilogue.)

Boating, fishing, Charter Boats, and recreational sailing as well as seaplanes, enjoy the Lakes, and are enormous bi national and even international assets.

Lake Erie belongs to both Canada and the U.S. : Here are some critical facts about Lake Erie boating and fishing.

[Who boats on Lake Erie?](#) • 59,000 boats registered within the Ohio boundaries of our Great Lake • Sea Ray and Bombardier produce the most boats in Ohio • Sailboats make up 2 percent of the boats registered on Lake Erie. • 2% of all registered boats are sail boats; propeller, 44,342; waterjet, 11,616; sail, 1,375 • Add kayaks, canoes, waterboards, etc. Add the Canadian side, with abundance in birding, historical tourism, boating of a very high activity, and as some say, the most interesting boating experience in North America, referencing the Lakes in general. Lake Erie on the Canadian side boasts: “Being the southernmost, warmest and most biologically productive of the five Great Lakes, Lake Erie is a serious boater’s paradise.”

- Chatham Kent beaches, boating, south-central Chatham Kent, cottagers, services for boating, marinas and boat repairs
- At Point Bruce, the large beach waterfront park hosts picnic and sports areas, a launch ramp, and restaurants. The area offers excellent swimming in shallow clear water with a buoyed area for younger swimmers. Another stopping point is the Provincial Park at Port Burwell, which is referred to as Canada’s deep south, and being on the migration route, it is one of the best places to observe the song birds, Monarch butterflies, blue jays and dragonflies • Point Pelee National Park attracts 400,000 visitors each year • Lake Erie is also home to one of the world’s largest freshwater commercial fisheries and it’s worth a visit to see and watch

the boats when they come into port at the end of the day. Walleye, Yellow Perch, Rainbow Trout, White Bass and other species are predominant in these warm waters. As a result the sport fishing industry is alive and well • About 35% of Canadians (9.4 million people) participate in boating and Canadians own over 4.3 million boats, contributing to 4 Billion in revenues annually

We note again note that boaters both sides of the border enjoy all of these natural assets and community benefits.

Included for your convenience, is the letter from the Michigan Boating Industries.

The link is here: <http://greatlakeswindtruth.org/newsworthy/no-to-icebreaker-letter-to-opsb-from-michiganboating-industries/>

MBIA FIGHTS TO STOP FUTURE WINDMILL GRAVEYARD IN LAKE ERIE!

Livonia, Mich, September 20, 2018 – The Michigan Boating Industries Association, along with environmental groups, boating associations and property owners are presenting members of the Ohio Power Siting Board with petitions calling for rejection of a proposed wind turbine demonstration farm in the waters of Lake Erie off Cleveland that's slated to be considered in a closed hearing on Monday, September 24 in Columbus. Permits to build the wind farm, dubbed "Icebreaker," are being sought by the Lake Erie Energy Development Corporation (LEEDCo). Its purpose is to stimulate the development of 1,000 or more wind turbines in Lake Erie and other Great Lakes. But that's not going to have smooth sailing according to a variety of groups from Ohio and Michigan.

Nicki Polan, executive director of MBIA says: "MBIA is not opposed to alternative sources of energy. But, regarding wind farms in our Great Lakes, we find far too many unanswered questions and documented risks to the health and aesthetics of these unique and often times fragile bodies of water. We stand opposed to plans such as the one being considered in Ohio now." Excerpt: see link below for entire letter.

CONCLUSION

The industry tells the public and supporters that wind turbines are clean, free, safe, and will save the planet. The truth is that you could cover the planet with turbines, and you would still need 100% backup from fossil fuels, from birth to maintenance, to decommissioning. The turbines are manufactured with fossil fuels; use fossil fuels

throughout their lifetime. (“[On average 1 MW of wind capacity](#) requires 103 tonnes of stainless steel, 402 tonnes of concrete, 6.8 tonnes of fiberglass, 3 tonnes of copper and 20 tonnes of cast iron. The elegant blades are made of fiberglass, the skyscraper sized tower of steel, and the base of concrete”, in our case, steel towers.) Not a single coal fired plant world wide has shut down because of the proliferation of wind.

We cannot imagine Lake Erie becoming a wasteland of eco junk.

In a nutshell, we outline our concerns.

1. The developer has not been “forthcoming” with comments and descriptions to the public. When public outrage to the actual “plan” evolved, up to and more than 1400 massive turbines, a Saudi Arabia of wind, as Rep Marcy Kaptur calls it, they quickly backed to this is only a “demonstration” project of six. Several sources have cited the developer and supporters outlining capability to have 5,000 megawatts in Lake Erie by 2030. ([President of LEEDCo Lorry Wagner quoted in Hi Velocity](#) May 19th, 2011)
2. The developer(s) are now foreign billionaire multi nationals, with a 50-year lease of the lake bed, skimming off precious tax dollars and subsidies, loans, guarantees, forgivenesses, and advantages of an obscene level. It is our view that this is theft. There will be no public need for the proposed project. There will be no net benefit.
3. Public trust issues are of a high priority; contamination of publicly held assets must not be allowed. No public need as the population of Cleveland is falling every year and higher priced electricity will hurt the poor.
4. Public trust violations by this project will eventually lead to costly court battles.
5. There are obvious serious and irreversible impacts pending to wildlife, water quality, fishing, birding, boating, aesthetics, health of humans on shorelines, some of whom will be certainly impacted as ILFN (Infra and Low Frequency Noise) travels over water some 30 miles before attenuating.
6. The developer’s presentations have been less than sincere, imputing that there are no birds or bats that fly over the water. NOTHING COULD BE FURTHER FROM THE TRUTH. We can see them both sides of the border, coming and going. It is typical of wind developers to obfuscate and even hire “experts” to testify that no “biological harm” will occur. That is wind developer and cronies talk for: the species will not be exterminated. [But we know that SOME species are on the verge of extinction from industrial wind](#), and it is reasonable to assume in the case of the biodiverse Lake Erie Macro Migration chains, the impacts will be serious, long lasting, and dangerous to population recovery. (There is a maternity colony of the endangered Indiana Bat in Cuyahoga County, for example. There are colonies within the Cuyahoga National Park. It is reasonable to imagine that proposed turbines will be attractive to this/these and yet unknown maternity colonies.)
7. The developers variously have focused on job creation, but this is a supply chain that will never materialize since at this time most parts come from all over the world, and the current owner of the proposal is a Norwegian billionaire who will certainly market his own wares first.

8. The evolved til now MOU and agreement to “mitigate” is faulty. It is impossible to use current methods of radar to assess “species,” endangered species, many, that are over the water, and to determine which are lost, destroyed, is equally impossible.
9. Proper and legal First Nations consultations have NOT been carried out.
10. The assumption that the air will be cleaner from this proposed project are patently false and misleading to the public. Not a single coal fired plant IN THE WORLD has shut down despite the grand proliferation of wind turbines. Europe’s CO₂ has risen, not fallen. This is one of the most grievous lies of the industry: to promise cleaner air from possibly the filthiest of all energy sources. World wide, net zero electricity is produced from wind. Point two of one percent.
11. Back up, reliable and constant, is always required or required to be available. The ramping up and down of availability and on hold power, is costly and not environmentally good practice. This of course involves any of gas, hydro, nuclear and yes, coal. 100% of the time, 24/7.
12. Please [SEE THIS](#) to understand that wind turbines can never replace fossil fuels;



“Electricity simply doesn’t substitute for all the uses of fossil fuels, so windmills will never be able to reproduce themselves from the energy they generate — they are simply not sustainable. Consider the life cycle of a wind turbine – giant diesel powered mining trucks and machines dig deep into the earth for iron ore, fossil-fueled ships take the ore to a facility that will crush it and permeate it with toxic chemicals to extract the metal from the ore, the metal will be taken in a diesel truck or locomotive to a smelter which runs exclusively on fossil fuels 24 x 7 x 365 for up to 22 years (any stoppage causes the lining to shatter so intermittent electricity won’t do). There are over 8,000 parts to a wind turbine which are delivered over global supply chains via petroleum-fueled ships, rail, air, and trucks to the assembly factory. Finally, diesel cement trucks arrive at the wind turbine site to pour many tons of concrete and other diesel trucks carry segments of the wind turbine to the site and workers who drove gas or diesel vehicles to the site assemble it.”

13. THE GREAT LAKES ARE A PRECIOUS NATURAL ASSET, AND BI
NATIONALLY PROTECTED AREA.

We are not fossil fuel pushers, nor haters, but certainly we are not advocates of a source of aggravation and stress to every living thing; supporters of an obsolete and destructive force, useless, intermittent, a glorified virtue signaling of immense ultimate harm. **There are no eggs being broken to miraculously become omelets. Industrial wind simply does not work, as noted recently [by Bill Gates](#). Indeed, anyone thinking that wind turbines are not constructed, transported, maintained entirely by fossil fuels, has not likely done his/her homework.**

We object strenuously to the litany of misrepresentations from wind developers, the rent seeking, the callous disregard for human and animal life.

In the case of the proposed Lake Erie six turbine array, one must debunk the developer driven prevailing myths: that there will be jobs, cleaner air, and a salvation for the climate. The truth is that there will be a few **temporary** jobs, net job losses if the project expands, more CO₂, and DIRTIER air because you will always need back up from reliable base load power.

[This project has been objected to by groups and persons in Spain, Germany, the UK, France, Canada, Denmark, Slovenia](#), and many others who understand the nature of the assault about to possibly happen. They have been there, done that. Cautionary tales.

Some of these international objections were outlined by John Miner in the London Free Press. (See link below)

[Additionally, individuals from OHIO and around the US have sent letters to the OPSB in volumes](#). NA-PAW represents over 380 groups and millions of US and Canadian citizens, and not one of our groups or members has voiced support for this ridiculous project. Our friends at Cleveland, Lake Erie Foundation and Save our Beautiful Lake, and their or our associated groups, are **very active** in protesting this proposal.

A CLOSER LOOK AT THE DEVELOPER'S EXPERTS AND TECHNIQUES

It is crucial to remember that highly paid pro developer experts prepare and have prepared reports and testimony that any one with common sense and a keyboard to Google, can challenge with ease. In this case, we repeat that this developer, as many others propping up harmful project proposals, has declared and reported that “birds and bats do not travel over Lake Erie.” The Developer of LEEDCo, initially hired Kerlinger, a famed bird expert, who has testified hundreds of times pro developer. Dr. Kerlinger's report on behalf of LEEDCo no longer seems to be available on line. In that report he claimed that there is [“nil chance of the Indiana Bat migrating”](#) to the possible roosting attractions (turbines) at Lake Erie offshore. This is the same Dr. Kerlinger asked to study migration at the infamous never working CNE (Canadian National Exhibition) turbine in

Toronto, who declared that only one bird was killed, no then it was three, and then the study was terminated just as migration began. (This was reported on the phone to NA-PAW by the Head of the FLAP (Fatal Light Awareness) program, who was vehemently opposed to a turbine at the shoreline in Toronto.) This “expert,” Kerlinger, to many, has become the poster child of ornithological dishonesty. There is enough evidence to show that the harm to wildlife, flying creatures including the [migrating Monarch butterfly](#), which is [sometimes seen by glider planes over the Lake at 10,000 feet](#), will be immense with the Icebreaker proposal. Dr. Kerlinger has testified:

CLEVELAND -- [A new report by a wildlife expert](#) claims that the Lake Erie wind turbine project called "Icebreaker" will have no significant biological impact on birds and bats near its operations.

Dr. Paul Kerlinger said, "The weight of evidence gathered from studies conducted over many years is quite conclusive. Biologically significant impacts to any bird or bat species, including those that are endangered and threatened are highly unlikely."

In contrast to Dr. Kerlinger’s 2013 comments and review, are hundreds of observers, bird groups, experts, who know that the impacts would be inevitably massive.

The testimony in Columbus, Ohio, by Avian expert now for Icebreaker, Caleb E. Gordon, PhD, in deposition by Lawyer John Stock, is interesting enough to highlight here.

MR. GORDON: *To make sure I understand the question; have I designed and implemented such a project?*

MR. STOCK: Yes.

MR. GORDON: *No, I have not.*

MR. STOCK: *Have you designed and implemented any study to determine the correlation between the density of nocturnal migratory birds within a turbine -- wind turbine project area and the mortality rate of such birds in an operating wind turbine project?*

MR. SECREST: *Objection. Vague. You can answer.*

THE WITNESS: *Excuse me?*

MR. SECREST: *Objection. Vague. You can answer.*

THE WITNESS: *I want to make sure I understand the question. Are you asking have I designed and implemented a study specifically to determine the relationship between density of migrating birds in the project area and the fatality?*

MR. STOCK: Yes, when the project is operating.

THE WITNESS: *No, I have not.*

MR. STOCK: Okay. During the annual spring migration of migratory birds over Lake Erie, how many birds migrate through the rotor-swept zone of the proposed project site?

MR. GORDON: Well, it's difficult to say with precision.

Mr. STOCK: Okay.

MR. GORDON: I could bracket the range very broadly.

MR. STOCK: Okay. Bracket the range for me.

MR. GORDON: Difficult to say with precision.

MR. STOCK: Bracket the range for me.

MR. GORDON: Well, the best I would do would be to make a fairly broad bracket.

And, in fact, I don't have a very good basis for putting specific numbers of what you asked for specifically, which is how many birds pass through the rotor-swept zone -

....

MR. STOCK: To a reasonable degree of scientific certainty, what is your opinion of the number of birds that migrate through the rotor-swept zone of this project?

MR. GORDON: My opinion is that the number of birds that migrate through the rotor-swept zone of this project, spring migration, is representative of the number that migrate through any region of a similar size in the Great Lakes region or below.

MR. STOCK: And what's that number?

MR. GORDON: I don't know the exact number.

MR. STOCK: Okay. Do you have a range on the number?

MR. GORDON: No.

....It is too interesting to stop now:

MR. STOCK: Mr. Gordon, I've handed you what I've marked as Exhibit E. Would you please identify that for the record. This is the document entitled "Icebreaker Wind: Summary of Risks to Birds and Bats."

MR. GORDON: It is the document we refer to as the risk assessment or the "West Risk Assessment." It is the document that we prepared, we at West prepared for the Icebreaker project in November 2016.

MR. STOCK: Can we agree that no data exists regarding bird or bat fatalities at wind turbine projects situated within the Great Lakes inasmuch as no such projects exist at this point; correct?

MR. GORDON: I would say that is a deceptive question because of the last thing you mentioned. There are no offshore wind projects sited in the Great Lakes; therefore, there is no data from there. There could not be because they don't exist.

MR. STOCK: Okay. And are you aware of any mortality studies for a wind turbine project that is located within an inland lake?

MR. GORDON: I am not aware of any.

MR. STOCK: Okay. So there's no data regarding any project within the Great Lakes because none exists; and you're not aware of any data, as we sit here today, regarding

mortality studies for a project located within an inland Great Lake or an inland lake; correct?

MR. GORDON: Uh-huh.

MR. STOCK: Okay. Now, can we agree that it will be difficult, if not impossible, to determine bird and bat fatalities at the windbreaker [sic] site?

MR. GORDON: I think you meant "Icebreaker."

MR. STOCK: Icebreaker. Thank you. And it will happen. Thank you.

MR. GORDON: No. We cannot agree on that.

MR. STOCK: All right. So you wouldn't say that it will be difficult, if not impossible, to determine bird and bat fatalities at the site? To determine bird and bat fatalities at the site. From the operation of the wind turbines.

MR. GORDON: No.

MR. STOCK: How will you do it?

MR. GORDON: Again, I want to say this is also outside of the primary area of my testimony because you're now asking about methods that will be applied in the future at the project. Those methods are being determined by other folks in other processes. So I don't know how they will do it.

MR. STOCK: Okay. But you're confident it won't be difficult?

MR. GORDON: "Difficult" is a relative term.

MR. STOCK: Okay. Sometimes getting out of bed in the morning is difficult. Is it difficult? Is it easy?

....

On being questioned about baseline data:

MR. GORDON: I would say that the Fish and Wildlife Service report, while you could consider it baseline data, but what I described earlier to define baseline data, you would not generally include that as baseline data. That would be included as other publicly available, pertinent information.

MR. STOCK: I stand corrected; right. It didn't relate to this project.

MR. GORDON: Right.

MR. STOCK: Baseline data relates to this project. Okay. Okay. "West has completed a review and summary of baseline data and other publicly available data." What was the other publicly available data?

MR. GORDON: Like I said, it included all pertinent information, both broad and narrow in scope, peer-reviewed published technical publications, government technical reports such as this Fish and Wildlife Service report and others, as well as other additional publicly available sources of information that we deemed to be pertinent to assessing risk to birds and bats at this project.

MR. STOCK: Okay. "The overall conclusion of this analysis is that the project poses a low risk of adverse impacts to birds and bats." This conclusion stems largely from two principal observations. One, the project is small in scale, consisting of six turbines; and

two, the level of use of this area by birds and bats is low compared to bird and bat use of terrestrial and [sic] nearshore environments." I read that correctly, did I not?

MR. SECREST: Actually it's "or."

MR. STOCK: Okay. Or. Excuse me.

MR. SECREST: "Terrestrial or nearshore environments."

MR. STOCK: Thank you.

MR. SECREST: Yes. Other than that, yes.

MR. STOCK: Okay. Thank you for the correction.

MR. STOCK: We've been through the information you have regarding density presence of birds and bats in rotor-swept zone area. I'm not going to repeat that. Has this conclusion, this specific conclusion, been -- it has not been peer reviewed in any way; correct?

MR. GORDON: It has been extensively peer reviewed inside of West, among West's many scientists with expertise in this area. It has not been externally peer reviewed because it **is confidential information**. (Our emphasis)

MR. STOCK: Okay. Page Roman Numeral ii, first full paragraph, you talk about collision effects. I want to go down to the last sentence. "The project is not likely to generate population level effects for any species. These conclusions are based primarily on the low use of offshore environments within the Central Lake Erie Basin by birds and bats." What data is that conclusion based upon? (Pages 84 and 85 refer to Kerlinger input from a prior study, Geo Marine, 2008)

The remaining testimony appears to underscore the expert's basic lack of knowledge of bird and bat life in the basin, over the water, and problems with the radar setup for studies.

MR. STOCK: Did you have any awareness that the Fish and Wildlife Service considered the Tetra Tech data to be largely uninformative?

MR. GORDON: I did not know that actually.

<http://dis.puc.state.oh.us/TiffToPDF/A1001001A1818B35657A01769.pdf>

On the other hand, Kim Kaufman, BSBO, and others, record that this area is a "bottleneck" of bird and bat migratory action:

"We are the bottleneck of so many migrating birds. If we get it wrong, we could impact the global population of some species," said Kaufman.

The opposition is growing to installing wind turbines along the Lake Erie shoreline as a source of generating renewable energy.

It's coming from the Black Swamp Bird Observatory, sponsor of the just completed 'Biggest Week in American Birding' event.

Ninety-thousand birders from across the world came to our area to watch and photograph the annual bird migration.

The warblers and other species stop here to rest and re-fuel on insects before heading out across Lake Erie into Canada.

"This is an awesome spot for warblers and seeing different kinds of birds. It's like a treasure hunt," said Judy Lang of Columbus.

There is zero question that the placement of wind turbines, six or 1400 plus, is irresponsible, unnecessary, falsely premised, and an environmental disaster in the making, should it proceed. Frankly, nothing could appear more ridiculous, than for an ornithological expert to testify and conclude that there is "low use of offshore environments within the Central Lake Erie Basin by birds and bats."

[A letter to USACE](#) (US Army Corps of Engineers), Mr. Joseph Krawczyk, Buffalo office, 2017, outlines ABC and BSBO's concerns for the "misleading and erroneous" studies:

To Whom It May Concern:

Black Swamp Bird Observatory (BSBO) and the American Bird Conservancy (ABC) jointly reviewed the Department of Energy's (DOE) draft document Environmental Assessment LEEDCo Project Icebreaker Lake Erie, City of Cleveland, Cuyahoga County, Ohio, co-authored by the U.S. Coast Guard and the U.S. Army Corps of Engineers, and we submit the attached comments in critique of the draft.

In summary, it is our opinion that the draft Environmental Assessment (EA) is founded upon invalid, misleading, and erroneous studies presented by both Tetra Tech and Western EcoSystems Technology (WEST) on behalf of LEEDCo which are not supported by the data.

Further, we find that because the Kirtland's Warbler, a federally designated Endangered Species, is known to be present in the project area during migration, and because the project area is within the confines of a Globally Important Bird Area, an EA is not

sufficient to fulfill the requirements of the National Environmental Policy Act (NEPA), and that a more comprehensive Environmental Impact Statement (EIS) is required.

Please find attached our comments related specifically to four documents: (1) the draft EA, (2), Appendix J of the EA (WEST NEXRAD Analysis), (3) Appendix K of the EA (Tetra Tech Bird Survey Report), and (4) Appendix L of the EA (WEST-Icebreaker Wind: Summary of Risks to Birds and Bats). We believe the details contained in these comments support our findings and our conclusions calling for an EIS to be completed instead of an EA.

There cannot be a turbine project in the middle of historic and internationally known birding life. There cannot be a project approval underwritten by a shoddy corrupted study, a proposal with no meaning, no public benefit, and of such ultimate harm.

We once more refer to the costly and disastrous failure of wind turbine proliferation in Ontario, Canada, and the government whose only saving grace, and we do mean “only,” is that they protected all of the Great Lakes in their jurisdiction, from environmental disaster. (Offshore moratorium, 2011) We also refer to the failure of the US (New York State) GLOW project, financially impossible. It would be in our view a failure of social and environmental responsibility, for Ohio to proceed with “any” turbine development offshore.

Respectfully, we ask you to use all your power and influence to terminate this “Icebreaker “proposal. It is abundantly clear that attempts to disguise the abundant bird and bat activity in the project area are lame, are based on completely false and deceptive promotions of the idea of lack of biological abundance or harm. This is one of the world’s MOST abundant bird and bat and insect life habitats, a precious Lake with unique properties that virtually gives sustenance to **hundreds of millions of creatures every year.**

Please ensure that this proposal halts now, forever.

Thank you most sincerely,

Sherri Lange

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<http://greatlakeswindtruth.org/cleveland-leedco/offshore-wind-plan-in-lake-erie-criticized-internationally/>

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<https://www.masterresource.org/offshore-windpower-issues/lake-erie-wind-turbines-complaints-pour-part-2-environmental-issues/>

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<https://monarchwatch.org/blog/2015/10/14/monarchs-over-lake-erie-waters-citizen-scientist-observations/>

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https://abcbirds.org/wp-content/uploads/2017/10/DOE_EA_Complete-Documents_BSBO_ABC.pdf

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<http://greatlakeswindtruth.org/cleveland-leedco/letters-to-the-doe-and-opsb-re-leedco/christine-metcalf-of-scotland-writes-to-the-doe-in-no-uncertain-terms/>

<https://monarchwatch.org/blog/2015/10/14/monarchs-over-lake-erie-waters-citizen-scientist-observations/>

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.

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Summary: Public Comment (4) received via website electronically filed by Docketing Staff on behalf of Docketing.