

April 4, 2019

The Honorable Governor Mike DeWine
Riffe Center
77 South High Street, 30th Floor
Columbus, Ohio 43215



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Lake Erie: For Business. For pleasure. Forever.

Dear Governor DeWine:

We the undersigned organizations, believe that Lake Erie is not an environmentally responsible location for a wind facility. We urge the State of Ohio to *stipulate the completion of an Environmental Impact Statement (EIS), as a condition of the Submerged Land Lease that ODNR granted to Icebreaker Windpower Inc. (SUB-2356-CU).*

This stipulation for an EIS is grounded in the National Environmental Policy Act (NEPA), which states that a project with specific attributes requires an EIS. In this case, those attributes include (1) the project's possible effects on the human environment are uncertain; (2) there is uncertainty regarding the potential impacts of this project to the Lake Erie's already fragile ecosystem; (3) the project is precedent setting as it would be the first offshore freshwater wind facility; (4), the developer has stated that although Icebreaker is technically a six turbine "pilot" project, they intend to use Icebreaker to demonstrate the feasibility for building a utility-scale wind project, consisting of 1,400 to 1,500 wind turbines in Lake Erie.

LEEDCO has been working to garner support for Icebreaker, by stating that Icebreaker has "no intent to build any more than six wind turbines on Lake Erie". However, LEEDCO claims that this project can "create 8,000 new good paying jobs and pump nearly \$14 Billion into our economy by 2030". Six wind turbines will not create 8,000 jobs, pump \$14 Billion into the economy, or attract a major European wind developer like Fred Olsen. Approximately 1,450 wind turbines will need to be built in Lake Erie by 2030 to reach those goals, according to LEEDCO's own 2010 economic study.

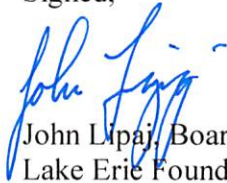
The State has an obligation through the Public Trust Doctrine, to protect Lake Erie for the benefit of Ohio's citizens, not a foreign for-profit corporation. As such, the ODNR must show that they've based their decisions, decisions affecting the future of Lake Erie, on the proper due diligence. An EIS is the correct document to guide the State's decisions on a project of this magnitude.

Stipulating the completion of an EIS as a condition of the Submerged Land Lease will demonstrate to Ohio citizens that Governor DeWine has taken the prudent and appropriate course of action to protect Lake Erie for Ohio's citizens.

We urge you to take decisive action to require a stipulation that rescinds the submerged land lease previously granted to Icebreaker, until completion of an Environmental Impact Statement.

Thank you for your consideration.

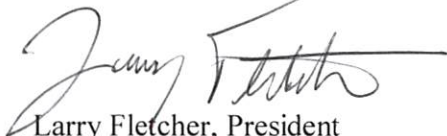
Signed,



John Lipaj, Board member
Lake Erie Foundation



Michelle Burke, President
Lake Erie Marine Trades Association



Larry Fletcher, President
Lake Erie Shores and Islands



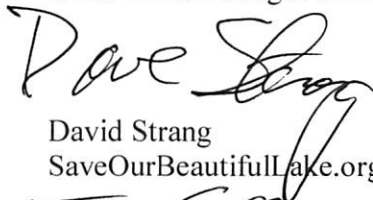
Cindy Johnson, Commodore
Interlake Yachting Association



Michelle Burke, Executive Director
The Boating Association of Ohio



Rick Graham, National Great Lakes Committee Chairman
Izaak Walton League of America



David Strang
SaveOurBeautifullake.org



Thomas Sullivan
NoLakeErieWindFarm.org



Cc: Mary Mertz, Director, Ohio Department of Natural Resources

The Lake Erie Foundation's position on the Industrial Wind Turbine Facility planned for Lake Erie



Icebreaker Windpower Inc. is planning construction of (6) six 480' tall wind turbines in Lake Erie, 8 miles Northwest of Cleveland. This is a pilot project to demonstrate the feasibility of building an additional 1,400 to 1,600 wind turbines in Lake Erie, then throughout the remaining Great Lakes.

LEEDCO, the local non-profit which began this project, has held 400 meetings with the public to garner support. They have presented this project to the public during those meetings as a 6 to 8 wind turbine demonstration project. However, LEEDCO executives have been quoted by multiple news sources stating their plans to generate 5,000 megawatts of electricity from wind turbines on Lake Erie by the year 2030, which would require building 1,400 to 1,600 wind turbines on Lake Erie.

LEEDCO has also garnered support by the public and labor by claiming that the Icebreaker wind turbine project would create 500 local jobs. Yet according to LEEDCO's own Study, only 159 *temporary* local construction jobs would be created. The same study points out that only 9 *permanent* onsite labor jobs would be created.

Ohio's Public Trust Doctrine states that the land beneath Lake Erie's waters is held in trust by the State of Ohio and is to benefit its citizens. For a private entity to develop the land beneath the waters of Lake Erie, requires a Submerged Land Lease. LEEDCO obtained a Submerged Land Lease from the State of Ohio giving them a 50 year lease for the area beneath Lake Erie where the turbines and power cables would be located. In early 2017, the State of Ohio approved the transfer of that lease from LEEDCO (an Ohio non-profit) to Icebreaker Windpower, Inc. (which is owned by a large foreign multinational corporation called Fred Olsen, with interests in oil & gas exploration as well as renewable energy).

Environmental experts such as the U.S. Fish and Wild Life Service and Nature Conservancy recommend not building wind turbines *in or within*, three miles of any of our Great Lakes due to the risks that they pose to millions of migrating birds.

The Black Swamp Bird Observatory hosts a 10-day festival each Spring that draws around 90,000 visitors and generates an estimated \$40 million in tourism revenue to the Lake Erie region annually. They oppose the Icebreaker Project, which intends to place wind turbines in the Central Basin of Lake Erie, a designated Globally Important Bird Area, placing millions of migrating birds in harm's way as they migrate across the Lake. Bald Eagles, once near extinction, now thrive along the shores of Lake Erie would also be at greater risk of flying into turbines blades as they hunt for fish offshore in the winter.

The full effect of wind turbines on freshwater marine life is unknown. The Nature Conservancy recommends that no wind turbines be built in Great Lakes Open Waters to avoid disturbing sediment from turbine construction that can be lethal to fish eggs and larvae. They also point out that offshore wind turbine construction activity attracts predators to fish spawning and nursery areas, which could deplete our natural fisheries. Michael Pierdinock, chairman of the Massachusetts Recreational Alliance which represents 50,000 recreational fishermen said that electromagnetic fields emanate from the power cables connecting the Block Island offshore wind turbines to land. Pierdinock said, "The area where the cable lines extend to the mainland, it's completely devoid of fish." "These used to be fruitful fishing grounds." Lake Erie's sport fishing expenditures top \$1 billion annually. The potential risk to our freshwater fisheries cannot be justified for a "demonstrator" wind project.

The economic impact of recreational boating in Ohio is \$3.5 billion. Top Lake Erie boating groups such as the Lake Erie Marine Trades Association, Greater Cleveland Boating Association, Michigan Boating Industry Association and the Inter Lake Yachting Association, representing hundreds of thousands of Lake Erie boaters, have voiced their opposition to building wind turbines in Lake Erie.

Total tourism-related spending for the (8) eight Lake Erie-bordering counties in Ohio, is about \$15.0 billion, supporting 127,000 jobs and generating \$1.9 billion in total taxes. A 2016 study by economists at North Carolina State University showed that most people are unwilling to rent vacation homes that have a view of offshore wind turbines. Laura Taylor, an author of the study said, "if turbines are built close to shore, most people would choose a different vacation location where they wouldn't have to see turbines."

The Lake Erie Foundation supports efforts to improve the environment and decrease global warming. However in this case, the negative environmental effects on Lake Erie, along with economic losses to tourism, spending, jobs, waterfront home values and taxes, appear to outweigh the several hundred jobs that this project claims to create. For these reasons, the Lake Erie Foundation opposes the Icebreaker Windpower, Inc. proposal to build wind turbines in Lake Erie.

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