

May 19, 2020

Subject: OPSB case 16-1871-EL-BGN, Icebreaker Wind Facility

Dear Chairman Randazzo, Mr. McCarthy, Mr. Butler, Ms. Pelanda, Ms. Mihalik, Ms. Stevenson, Dr. Acton, Ms. Mertz, Mr. Murphy and Governor DeWine,

We urge the OPSB to vote against the issuance of a Certificate of Environmental Compatibility and Public Need for the Icebreaker project.

While we support properly sited renewable energy projects, we are concerned about the unintended consequences of this project on Lake Erie.

1. One of the central issues concerning the Icebreaker Project has been minimizing harm to birds and bats. Icebreaker's base position is that the location was chosen because it would do the least harm to birds and bats. Icebreaker executives have publicly stated that birds "don't fly across Lake Erie, they fly around it".

The fact that millions of birds *do* fly across Lake Erie is why the Audubon Society designated Lake Erie as a Globally Important Bird Area. It's also why:

- the Nature Conservancy recommends avoiding wind energy development "within 5 miles of Great Lakes shorelines". This from the Nature Conservancy's Energy Siting Guidelines, "*Wind turbine development should avoid areas where large numbers of migrating birds concentrate (e.g., Audubon Important Bird Areas)*"...
- U.S. Fish and Wild Life Service(USFWS) guidance states that wind turbines should not be constructed in or within 3 miles of any of the Great Lakes. USFWS Ohio Field Office Supervisor Dan Everson in an assessment of the Icebreaker Project, stressed the need for an Environmental Impact Study (EIS) to be completed before Icebreaker should move forward.
- the American Bird Conservancy (ABC) and Black Swamp Bird Observatory (BSBO) have filed suit to block the Icebreaker Project from moving forward. Both make the case that EIS should be completed for this project, instead of a less thorough and less objective Environmental Assessment (EA).

We respectfully request that the OPSB require the completion of a full Environmental Impact Study (EIS) for any large utility projects (including Icebreaker) which are proposed to be built in or in close proximity to the shores of Lake Erie.

2. Technical issues have recently come to light, regarding the mono-bucket design that Icebreaker Wind plans to use as the foundation for their wind turbines in Lake Erie.

Northland Power Inc. has cancelled their Deutsche Bucht offshore wind “Demonstrator Project” after uncovering technical issues with the mono-bucket foundation design. Northland’s mono-bucket was designed by Universal Foundation, a sister company of Icebreaker Wind. Dolphin Drilling (oil & gas exploration), Universal Foundation and Icebreaker Wind are all owned by foreign billionaire Fred Olsen.

Now that the OPSB Staff and Board are aware of the technical issues with Icebreaker’s mono-bucket design, we respectfully request that they investigate these design flaws prior to taking a vote on Icebreaker Wind.

3. There is no “public need” for the Icebreaker Wind project.
 - Ohio already has abundant and reliable sources of energy.
 - The manufacture, transportation and construction of Icebreaker will *consume* more energy than this project is expected to generate. That consumption of energy will increase carbon emissions, which Icebreaker’s six turbines will likely never offset.
 - Fred Olsen does need the OPSB to issue the certificate before he can receive the U.S. taxpayer-funded subsidies and tax credits. Ohio’s citizens have no need and will not receive any benefit from this project.

The long-term environmental impacts of this project on Lake Erie have not been adequately answered by Icebreaker’s EA. The OPSB would need an EIS to be able to make an informed decision about the long-term environmental impacts of this project. And there is no case to be made for “public need” for this project. A foreign billionaire however, does “need” to build wind turbines in Lake Erie or he won’t receive the lucrative tax credits and tens of millions in U.S. government renewable energy subsidies.

We respectfully request that the OPSB vote against the issuance of a Certificate of Environmental Compatibility and Public Need for the Icebreaker project.

Thank you for your consideration and your service to Ohio.

Sincerely,

John & Annette Lipaj
Vermilion, Ohio

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

Summary: Public Comment of John & Annette Lipaj opposing issuance of Certificate of Environmental Compatibility and Public Need for the Icebreaker project electronically filed by Docketing Staff on behalf of Docketing