

From: [Puco ContactOPSB](#)
To: [Puco Docketing](#)
Cc: [Fischer, Mary](#); [Williams, Michael](#); [Agranoff, Jay](#)
Subject: comments for #18-1607-EL-BGN
Date: Monday, August 24, 2020 4:21:34 PM

From: Gail & Keith Moyer <kglmoyer@bright.net>
Sent: Monday, August 24, 2020 3:47 PM
To: Puco ContactOPSB <contactopsb@puco.ohio.gov>
Subject: Copy of virtual witness testimony case #18-1607-EL-BGN

Matt and Mary,

Attached is a copy of the virtual witness testimony that I, Gail Moyer, gave on Thursday, August 20, 2020. I was scheduled witness 9 on the 6:30 p.m. session. Images 3, 4, and 5 are the written copies of my testimony. Image 6 is the scan of Figure 8 mentioned on page 2 (image 4) of my testimony. Thanks for allowing me to testify.

Sincerely,
Gail L. Moyer

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OPSB Virtual Hearing for Emerson Creek Wind Farm

My name is Gail Moyer, I was born and raised in Bellevue, Ohio. I presently reside at 3040 South State Route 67, Tiffin, OH 44883, Bloom Township, Seneca County, and have lived there since 1981. I reside in the 10 mile viewshed area of the proposed Emerson Creek Wind Farm.

I would like to state that I am opposed to the proposed Emerson Creek Wind Farm, OPSB Case # 18-1607-EL-BGN for many reasons including: excessive noise levels, harmful levels of shadow flicker, harmful effects from infrasound, dangers of ground water impacts and well water contamination due to karst in the area, negative impact to our local airports, Life Flight service, property values, nature preserves, local bald eagles, migratory birds, and other wildlife, and the overall unsafe siting in a densely populated rural environment of all 87 of the 650 foot tall industrial wind turbines.

However, today I will focus my remarks on the visual impact assessment as submitted by Firelands Wind, LLC and prepared by EDR, (Environmental Design and Research, Landscape Architecture, Engineering, and Environmental Services).

According to Ohio Administrative Code 4906-4-09, (C) (6) "The applicant shall provide photographic simulations or artist's pictorial sketches of the proposed facility from at least one vantage point in each area of three square miles within the project area, showing views to the north, south, east, and west. The photographic simulations or artist's pictorial sketches shall incorporate the environmental and atmospheric conditions under which the facility would be **most** visible."

The assessment submitted 144 viewpoints. Of the 144 submitted photographic viewpoints, 10 were selected for visual simulation. Of those 10 viewpoints only 4 (VP 17, VP48, VP55 and VP82) were within the project area. VP 89, VP 44, and VP 68 were within 1 to 1 ½ miles out of the project area. VP 31 was 6 miles from the project and VP 135 and 138 were 9 miles outside the project area. All of the viewpoint visual simulations were in one general direction. **None** of the 10 photographic viewpoints chosen for visual simulation included views from the north, south, east, and west.

In Appendix F: 360 degree pictorial sketches, the submission attempts to fulfill Ohio Administrative Code 4906-4-09, (C) (6) by submitting views from N, S, E, and W. However, each of the rendering point views have at least one view with colored blobs blocking what you see, and the views to the south and east have a glare that alters the visibility of the scene. The renderings are definitely not "incorporating the environmental and atmospheric conditions under which the facility would be **most** visible."

Ohio Administrative Code 4906-4-08 (D) (4) Impact of the facility, Section (a) states: "Describe the visibility of the project, including a viewshed analysis and area of visual effect shown on a corresponding map of the study area." In the submitted document, Section 5.1.1 Viewshed analysis states: "The topographic viewshed analysis indicates that areas where there is no possibility of seeing the Project based on screening by topography alone are extremely limited."

This is verified in Figure ^{*}8: "Cumulative Turbine Count Viewshed Analysis. I will be attaching this to a copy of my testimony and sending it to the OPSB via email. On this figure, there are at least **four** areas in the proposed Emerson Creek Wind Farm where **185-231** turbines are potentially visible. There are an additional **11** areas in the proposed Emerson Creek Wind Farm where **149-184** turbines are potentially visible, at least **15** areas where **93-138** turbines will be visible, and in the 10 mile visual study area, the vast majority of the area will see up to **92** turbines.

I know that each of the wind farms separately submits their individual case for review, but I also believe that the OPSB is responsible for the overall affect of the wind projects being proposed in an area. Please take this seriously.

This is the third public hearing in our area that testimony has been submitted to the OPSB by my husband or myself concerning the violation of Ohio Administrative code by the visual impact studies being submitted by wind turbine companies.

What I have found true with my children and grandchildren seems to also be true with wind companies: if you are allowed to break the rules without consequences, you will continue to break the rules. If a wind company cannot be timely in submission of studies, and doesn't follow the law when submitting them, how can they be trusted to follow the law, safety regulations, and time constraints when constructing and maintaining the wind farm?

I respectfully request that the application for a permit to build Emerson Creek Wind Farm be denied. Thank you for your time and consideration of this material.

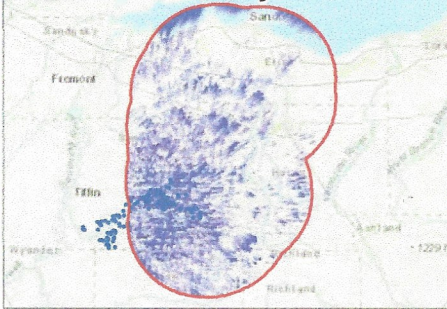
Individual Project Visibility within the Visual Study Area

Blade Tip Visibility Based on Topography, Structures, and Vegetation
Many Turbines Potentially Visible

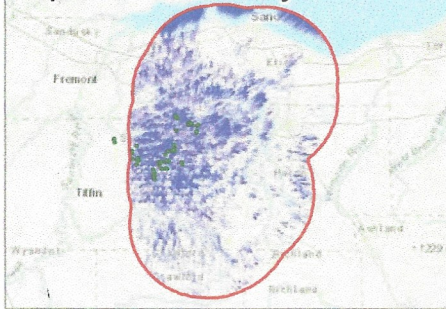
Few Turbines Potentially Visible

0 5 10 20 Miles

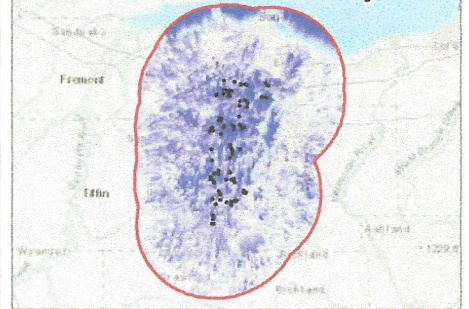
Seneca Wind Visibility



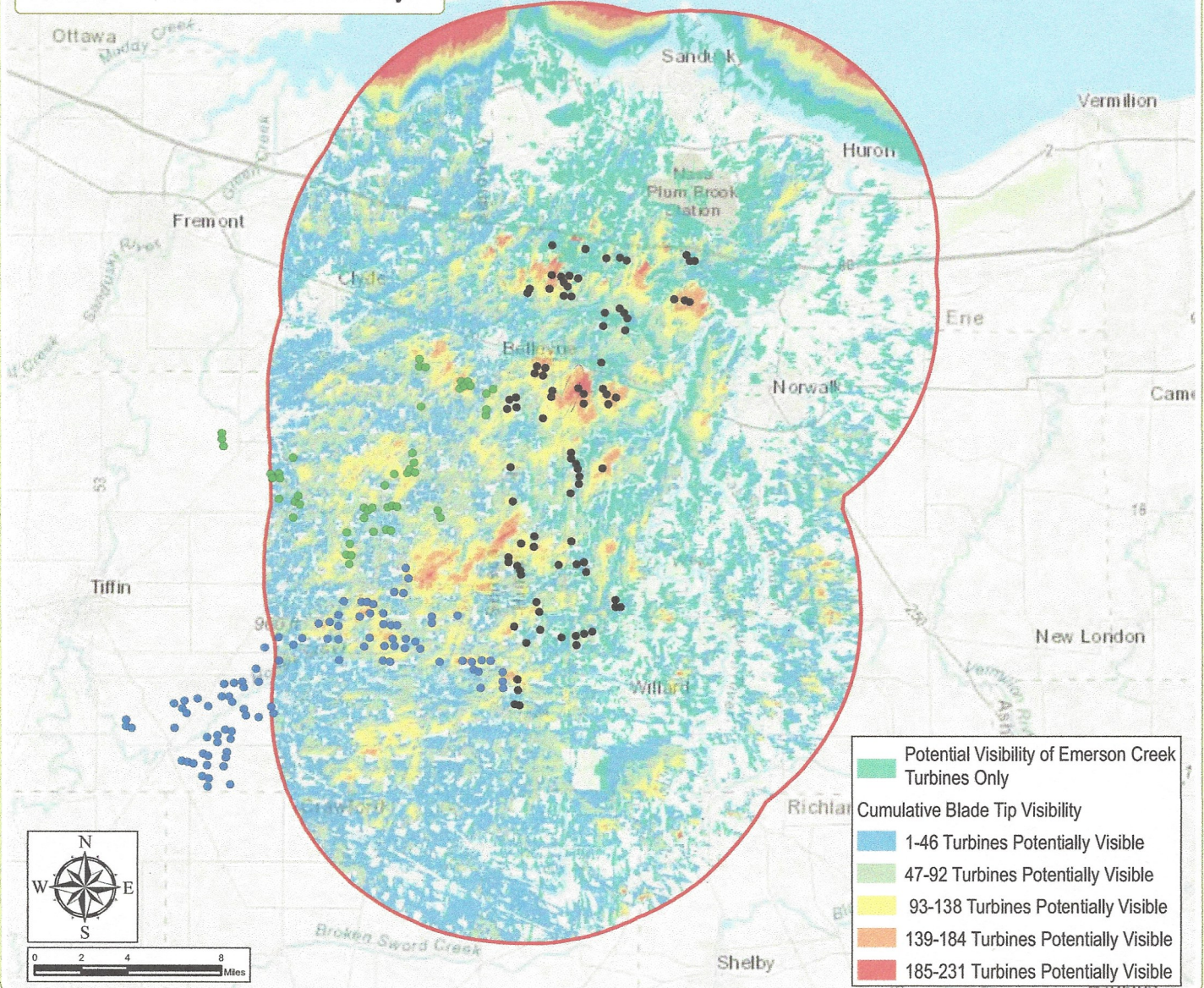
Republic Wind Visibility



Emerson Creek Wind Visibility



Cumulative Turbine Count Viewshed Analysis



Emerson Creek Wind Farm

Erie and Huron Counties, Ohio

Figure 8: Cumulative Viewshed Analysis

Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" map service.
2. This map was generated in ArcMap on January 25, 2019.
3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Emerson Creek Wind Turbine (87 Turbines)
- Republic Wind Turbine (50 Turbines)
- Seneca Wind Turbine (94 Turbines)

10-Mile Study Area

APEX CLEAN ENERGY

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Case No(s). 18-1607-EL-BGN

Summary: Public Comment of Gail L. Moyer, via website, electronically filed by Docketing Staff on behalf of Docketing