

Renewable Energy Working Group

of the Audubon Chapters in Pennsylvania

c/o Juniata Valley Audubon Society, P. O. Box 1013, Altoona, PA 16603

September 11, 2020

Sam Randazzo, Chairman
Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

Comments submitted via email to contactOPSB@puc.state.oh.us

Re: Icebreaker Windpower, Inc.

Dear Chairman Randazzo and Board Members:

The Renewable Energy Working Group of the Audubon Chapters of Pennsylvania appreciates the opportunity to share concerns regarding the Icebreaker wind turbine project approved for the Ohio waters of Lake Erie. We urge you to remain firm in your original ruling. As your neighbor, we know that what happens in the Ohio waters of Lake Erie will impact wind energy development in all of the Great Lakes. The standards set by the Ohio Power Siting Board could also affect Ontario's current moratorium on wind development in Lake Erie, Lake Huron, and Lake Ontario.

The signatories to this letter support Audubon's position: *"Audubon strongly supports properly sited wind power as a renewable energy source that helps reduce the threats posed to birds and people by climate change. However, we also advocate that wind power facilities should be planned, sited, and operated in ways that minimize harm to birds and other wildlife, and we advocate that wildlife agencies should ensure strong enforcement of the laws that protect birds and other wildlife."*¹

We would like to thank you for recognizing that the initial environmental studies were inadequate, and that a plan for post-construction monitoring of bird kills was not developed. Consequently, we applaud your decision to require Icebreaker Wind Power, Inc. to: turn off or "feather" the blades at night from March 1 through November 1; conduct radar studies of bird and bat migration pre- and post-construction, and develop and implement an impact mitigation plan.

The open waters of Lake Erie are already a challenge to migrating birds, as there is no place for them to land while they cross. Erecting turbines almost 500 feet tall in Lake Erie would add to that challenge, since tall structures are known to attract birds during adverse weather conditions.² In winter, the open waters around the turbines may also attract raptors such as Bald Eagles, which could lead to more predator and prey deaths.

The Icebreaker Project would be the first offshore freshwater wind turbine project ever built in the western hemisphere. The decision to build these turbines should be based on sound science. Removing the "feathering" clause from Icebreaker's permit would essentially sign the death

warrant for thousands of birds and bats and negate the importance of scientific research. We've already lost billions of birds over the last 50 years.³ We urge you to ensure continued safe passage for the birds and bats that fly over Lake Erie.

1. "Audubon's Position on Windpower," National Audubon Society, <https://www.audubon.org/conservation/audubons-position-wind-power>.
2. I. Newton, "Weather-related mass mortality events in migrants," *IBIS*, 149, no. 3, (July 2007): 453-467, (Wiley Online Library), <https://onlinelibrary.wiley.com/doi/10.1111/j.1474-919X.2007.00704.x>.
3. Kenneth V. Rosenberg^{1, 2}, Adrian M. Dokter¹, Peter J. Blancher³, John R. Sauer⁴, Adam C. Smith⁵, Paul A., "Decline of the North American Avifauna" *Science*, July 2019 <https://www.birds.cornell.edu/home/wp-content/uploads/2019/09/DECLINE-OF-NORTH-AMERICAN-AVIFAUNA-SCIENCE-2019.pdf>.

Sincerely,

Co-Chair: *Laura Jackson*, Vice-President, Juniata Valley Audubon Society
Co-Chair: *Judy Stepenaskie*, Member, Board of Directors, Wyncote Audubon Society
Leigh Altadonna, President, Wyncote Audubon Society
William Bock, Member, Board of Directors, Bucks County Audubon Society
Thomas J. Kuehl Jr., Allegheny Plateau Audubon Society
Susan Murawski, President, Presque Isle Audubon Society

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/14/2020 1:40:47 PM

in

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

Summary: Public Comment public comment by Laura & Mike Jackson, via website electronically filed by Docketing Staff on behalf of Docketing