



Federation of Monroe County Environmentalists  
348 Ripplewood Drive  
Rochester, NY 14616  
www.FMCE.org

RECEIVED  
PUBLIC SERVICE  
COMMISSION  
EXECUTIVE  
BANK  
April 10, 2015  
9 AM 11:04

Kathleen H. Burgess Secretary of the Commission  
New York State Public Service Commission  
Empire State Plaza Agency  
Building 3  
Albany, NY 12223-1350

Re: APEX Lighthouse Wind Farm Project in Towns of Somerset and Yates  
Project 14-F-0485

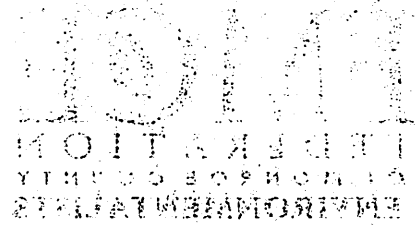
Dear Ms. Burgess and Siting Board Members:

The Federation of Monroe County Environmentalists (FMCE)\* is writing to express concern regarding the proposed 201 MW industrial wind turbine project, Lighthouse Wind, in Niagara and Orleans Counties in the vicinity of Route 18. The project area comprises 18,548 acres, stretches 11 miles along the shoreline and will include 60-75 wind turbines, collection lines, access roads, meteorological towers, a substation and maintenance building. We are alarmed at the potential size of the project given its proximity to the shore of Lake Ontario. These would be the tallest wind turbines in New York State and among the tallest in the country.

Data maintained by the Rochester Birding Association, Braddock Bay Raptor Research and Braddock Bay Bird Observatory, The Nature Conservancy and the Audubon New York highlight the importance of the South Shore of Lake Ontario as a major migratory route for birds, raptors and bats. This includes Golden Eagles, Bald Eagles, and Neotropical migratory passerines. The FMCE believes, along with the US Fish and Wildlife, the Hawk Migration Association of North America and the American Bird Conservancy that a three to six mile setback from the shores of the Great Lakes is essential for the protection of these migratory populations. Beyond this setback range, extensive multiple year studies are warranted to determine if wind turbine siting is possible.

The Lighthouse Wind project proposed by Lighthouse Wind LLC, a subsidiary of Apex Clean Energy Holdings, includes installation of some of the largest land based wind turbines in the country with blade tips reaching 570-600 feet into the sky. These would be comparable to off shore wind turbine heights. There is little data as to what effect so many turbines of this size would have on the ecology and migration patterns in our lakeshore region. FMCE does not believe that the Lighthouse Wind project is responsibly sized or sited and must look to alternative locations.

On January 15, 2015 a lawsuit was filed against wind turbine corporation Heritage Sustainable Energy, LLC regarding a 28 MW project that began operations in 2012. It has 14 wind turbines on Michigan's Upper Peninsula along the shores of Lake Michigan in Delta County. The lawsuit claims violations of



Environmental Federation of New York State  
1000 Avenue of the Americas  
New York, NY 10018  
Tel: (212) 512-1000

The Environmental Federation of New York State is a non-profit organization dedicated to the protection and preservation of the state's natural resources. We work to ensure that the environment is protected for the benefit of all New Yorkers. Our programs focus on air and water quality, hazardous waste, and the protection of our state's parks and forests. We also provide education and advocacy to the public on environmental issues.

Our mission is to ensure that the environment is protected for the benefit of all New Yorkers. We work to ensure that the environment is protected for the benefit of all New Yorkers. We work to ensure that the environment is protected for the benefit of all New Yorkers.

We are currently seeking individuals who are passionate about the environment and want to make a difference. We offer a variety of positions, including staff, volunteer, and board member roles. If you are interested in joining our team, please contact us at (212) 512-1000 or email us at [info@envfed.org](mailto:info@envfed.org).

For more information, please visit our website at [www.envfed.org](http://www.envfed.org). We are committed to transparency and accountability in all our activities. We welcome your input and feedback on our work.

Thank you for your interest in the Environmental Federation of New York State. We look forward to working with you to protect our state's natural resources.

Environmental Federation of New York State  
1000 Avenue of the Americas  
New York, NY 10018  
Tel: (212) 512-1000

General Valley Action Society  
208 West Broadway  
Rochester, NY 14615  
Tel: (716) 545-1000

Admission & Ticketing  
208 West Broadway  
Rochester, NY 14615  
Tel: (716) 545-1000

the Endangered Species Act, as related to numerous species. This is a much smaller wind project with shorter and fewer turbines than the one proposed along the shores of Lake Ontario. The size of the Lighthouse Wind project makes the stakes in our case even greater. These towers will be so large that removal will not be economically feasible.

The birds, raptors and bats including the migratory species are part of the public trust that we are charged with protecting. And the Lake Ontario shoreline ecology must not be compromised, degraded or destroyed. As a coalition of environmental organizations FMCE supports renewable energy projects such as wind when sited, sized and managed responsibly with care not to harm raptors, birds, bats and especially threatened and endangered species. FMCE supports a three to six mile wind turbine setback from the shores of the Great Lakes and beyond this distance three-year extensive environmental studies must be completed prior to a final siting decision to determine the effect of turbines on birds, raptors and bats. These reasonable Great Lakes guidelines for on shore wind turbines require that the Lighthouse Wind project look to alternative siting beyond the three to six mile setback and then begin environmental studies.

Sincerely,

Carol Hinkelman, Secretary

On behalf of the Federation of Monroe County Environmentalists  
<http://www.fmce.org/>

In addition to FMCE, the following organizations and individuals have signed on about this issue:

ORGANIZATION	CONTACT
Burroughs Audubon Nature Club 374 Cromwell Dr. Rochester, NY 14610	Shirley Shaw 585-385-3907 <a href="mailto:shirley@jashaw.com">shirley@jashaw.com</a>
Center for Sustainable Living 19 Jacque St. Rochester, N Y 14620	Alison Clarke 585-244-2711 <a href="mailto:accompost@gmail.com">accompost@gmail.com</a>
Genesee Valley Audubon Society 208 Rhea Crescent Rochester, NY 14615	June Summers 585-865-6047 <a href="mailto:summers@frontiernet.net">summers@frontiernet.net</a>
R-CAUSE (Rochesterians Concerned About Unsafe Shale-gas Extraction) 3021 Elmwood Ave. Rochester, NY 14618	Anna Sears & Nedra Harvey, Co-founders 585-473-4115 <a href="http://www.r-cause.net/">http://www.r-cause.net/</a>

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Rochester Birding Association 55 Ontario St. Honeoye Falls, NY 14472	Laura Kammermeir 585-730-9279 <a href="mailto:lmk88@rochester.rr.com">lmk88@rochester.rr.com</a>
Rochester Regional Group: Sierra Club 190 Edgerton St. Rochester, NY 14607	Peter debes 585-271-4796 <a href="mailto:phdebes@frontiernet.net">phdebes@frontiernet.net</a>
Living in Harmony Group 131 Parkmeadow Rd. Pittsford, NY 14534	Elizabeth Pixley 585-334-0977 <a href="mailto:epixley@rochester.rr.com">epixley@rochester.rr.com</a>
Monroe County People for Parks 175 Browncroft Blvd. Rochester, NY 14609	Cassandra Petsos 585-288-0955 <a href="mailto:chkpetsos@frontiernet.net">chkpetsos@frontiernet.net</a>
Individual 39 Elm St. Webster, NY 14580	Michele Anderson 585-216-2273 <a href="mailto:fidnemed3@gmail.com">fidnemed3@gmail.com</a>
Individual 91 Desmond Rd. Rochester, NY 14616	Dick Spade 585-234-0636 <a href="mailto:rpspade@frontiernet.net">rpspade@frontiernet.net</a>
Individual 24 Twilight Dr. Rochester, NY 14617	Dick Sutton 585-338-2642 <a href="mailto:rsutton2@rochester.rr.com">rsutton2@rochester.rr.com</a>

*\* The Federation of Monroe County Environmentalists (FMCE) is a coalition of active citizen groups in the Rochester area, founded in 1988, with over 5000 constituent members who support responsible growth and development, with protection of the environment. The Federation provides a central forum for citizens to discuss issues which are important to both our members and our communities: sustainable communities, smart growth, and stewardship of our world class water resources, land, trails and parks.*