

David L Roseman, MD
4629 N Ridge Road
Mears, MI 49436
(231) 873-7176
dlr@eolas.com

Stanley "Skip" Pruss
Director, Department of Energy, Labor and Economic Growth
Chairman, Michigan Great Lakes Wind Council (GLOW)
PO Box 30004
Lansing, MI 48909

Re: GLOW and the ownership and stewardship of the Great Lakes

Dear Mr. Pruss

My wife and I live in Golden Township, Oceana County. Until last month, we and our neighbors assumed that the Great Lakes would forever remain a pristine example of nature, for everyone to enjoy. For those of us who spend time along the shore and on the water, Lake ownership has not been an issue—the Lakes are owned by everyone and no one.

My neighbors and I were unaware of GLOW. That was before Scandia Wind LLC proposed building a large industrial complex a very short distance off our shore. The Scandia proposal has evoked an amazing response. An energized grassroots organization is forming. We are learning, as quickly as possible, the issues related to offshore wind development, and how this can be done responsibly. I have tried to collect those facts at <http://lakemichigapower.org>.

We are grateful to Scandia, since their proposal is so outrageous that it highlights some very important issues. Under present laws, leasing parts of the Great Lakes apparently falls under Part 325ⁱ and the Michigan Public Trust Doctrine. Part 325 provides for substantial input by riparian owners and riparian local governments. As we interpret the proposed GLOW legislationⁱⁱ, those rights would be stripped, and transferred to the State. This would largely remove meaningful local input. In addition to the obvious transfer of authority, this would seem to raise serious concerns with the Public Trust concepts.

GLOW has developed an impressive Final Report, which addresses many of the complex issues. An attempt has been made to synthesize these issues into categories of suitability for offshore turbines. The GIS methodology employed is promising, but is only as good as the data. We have questions about data that were omitted, and data which may be inaccurate. As an example of the former, the nature of the shoreline is not included. Should the buffer be different for an unpopulated or industrial coast than one that provides a tourism base for the local economy? That seems reasonable. As an example of the latter, at least some of the shipping lanes appear to be wrong or omitted. This is especially important for the Scandia proposal, in which a shipping lane that may have been omitted passes through the entire length of the footprint. A map showing this problem is at <http://lakemichigapower.org>. We are not disparaging the work of the mapping group. This is a complicated process. They have made an excellent start, but this should be viewed as a work in progress.

Assuming that these issues could be resolved, how would they be implemented? Using the shoreline buffer as an example, the six mile limit is almost certainly inadequate. Your Report references a University of Delaware study that was based on shorter turbines than those proposed. We don't find any offshore wind farms in the world, constructed or proposed, as close as that proposed by Scandia.

But in your proposed legislation, who makes that decision? You require some public hearings, but it appears to us that even overwhelming opposition could be ignored.

Public hearings must allow for input that can lead to meaningful change, and not simply be window dressing. We note, for example, that GLOW is planning three public hearings, yet it appears that these may be held after the legislative proposal is finalized. This strikes me as being disrespectful of public opinion

I am not opposed to offshore wind development. The technology exists, or will exist, to place these in the center of any of the Great Lakes. They would be essentially out of sight, and have minimal onshore impact.

I believe that the GLOW process could produce legislation which the local community would support. The current draft would not be good legislation. I ask that approval be deferred, at least until public comments are heard, and the questions we have raised are addressed. Otherwise, I think that our community will oppose the legislation with the greatest possible vigor.

I tried unsuccessfully to get addresses for the members of your commission. Would you be kind enough to send this to your members?

Thank you very much.

Respectfully,

David L Roseman, MD

ⁱ [Part 325, Great Lakes Submerged Lands](#), of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended

ⁱⁱ http://lakemichiganpower.org/references/references.htm#draft_legislation