

**APPENDIX E. DRAFT EA
COMMENTS AND RESPONSES**

**Lincoln Electric Draft Environmental Assessment
Comments and Responses**

Number	Commenter	Comment Summary	Response
1.	Euclid Historical Society	Concurs with determination that the proposed Project would not have an adverse affect on any historical properties and states support of project	Thank you for your comment.
2.	Cuyahoga County Board of Commissioners	Supports installation of 2.5 MW turbine at Lincoln's Headquarters for both renewable energy benefits and economic development purposes	Thank you for your comment
3.	Euclid Landmarks Commission	Concurs with determination that no above or below ground historic or cultural resources would be affected by the proposed Project and state	Thank you for your comment

		support of project	
4.	Mayor Cervinick, City of Euclid	Letter of support for 2.5 MW turbine at its proposed location to promote renewable energy use and economic development	Thank you for your comment
5.	State of Ohio US Representative Marcia Fudge	Letter in support or the proposed Project and its potential to provide renewable energy in Ohio	Thank you for your comment
6.	U.S. Fish and Wildlife Service, Columbus Ohio Field Office	Comment indicated several items: A. Draft EA did not discuss the consideration given to project in accordance with USFWS <i>Interim Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines</i> (2003) to protect migratory birds; B. That the DOE coordinate with Region 3 USFWS; C. Draft EA makes	<p>A.</p> <p>The following text will be added to Section 3.2.2.2 Biological Resources Section of the EA:</p> <p>During turbine siting, design and installation of the proposed wind project, LEC gave consideration to the guidelines contained within the USFWS <i>Interim Guidelines to Avoid and Minimize Wildlife Impacts</i> (2003). Following is a summary of the applicable recommendations and actions taken by LEC to comply with the recommendations:</p> <p>1) pre-development evaluations for wind farm sites by federal/state wildlife professionals:</p> <ul style="list-style-type: none"> ▪ LEC contacted both the USFWS and the Ohio Department of Wildlife regarding the proposed Project and both agencies provided responses on potential effects to wildlife. <p>2) rank site by risk to wildlife:</p> <ul style="list-style-type: none"> ▪ Based on telephones calls and written correspondence received from the ODOW and the USFWS (See Attachment C-3 and C-4 in Appendix C

		<p>inaccurate statement re: impacts to migratory birds <i>(follow-up comment sent from USFWS on July 29, 2010 retracting statement that project site was in West lake Erie Important Bird Area)</i></p>	<p>respectively) and the research conducted as part of the EA preparation for the proposed turbine location and its potential to provide habitat to bird, bat and other wildlife species, the proposed site is thought to be a low risk to wildlife.</p> <ol style="list-style-type: none"> 3) avoid placement of turbines in documented locations of federally listed species. <ul style="list-style-type: none"> ▪ No federally listed species are documented in the area and the site does not provide habitat for any federally listed species. 4) avoid locating turbines in known flyways or migratory paths. <ul style="list-style-type: none"> ▪ The proposed Project is not located within in a known migratory flyway or pathway and the West Lake Erie Important Bird Area is approximately 1.5 miles north of the proposed turbine location (See website: http://www.ohiodnr.com/LinkClick.aspx?fileticket=YWCawZmeP%2bo%3d&tabid=2134).. 5) avoid placement of turbines in bat habitat: <ul style="list-style-type: none"> ▪ The project site is not considered to be suitable bat habitat 6) configuration of multiple turbines and managing stormwater to avoid attracting wildlife: <ul style="list-style-type: none"> ▪ The proposed Project is a single turbine, so the configurations of multiple turbines was not considered in the analysis or design. The project has included stormwater BMPs in the design and construction plans. 7) avoid fragmentation of large tracts of habitat: <ul style="list-style-type: none"> ▪ Although the Lake Erie shoreline is approximately 2 miles north, the project does not fragment large tracts of habitat 8) minimize roads, fences, and other infrastructure: <ul style="list-style-type: none"> ▪ The proposed Project will utilize existing roadways or developed areas for all construction and installation activities. 9) develop a Habitat Restoration Plan for site that avoids or minimizes negative impacts on vulnerable wildlife: <ul style="list-style-type: none"> ▪ There are no protected raptor nests within 5 miles of the project and the turbine installation site is on industrial land and surrounded by urban/suburban development; thus, a habitat restoration plan is not necessary. 10) use tubular supports and avoid external lattice, ladders, platforms etc to minimize bird perching/nesting:
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			<ul style="list-style-type: none"> ▪ The turbine is a monopole design with no exterior lattice, ladders, guy wires or platforms. <p>11) use minimum lighting required by FAA:</p> <ul style="list-style-type: none"> ▪ Minimum FAA light recommendations will be used in consideration of avian and bat species. <p>12) adjust tower height if risk of strike is high:</p> <ul style="list-style-type: none"> ▪ The site is currently an industrial park and wildlife usage is very minimal. Because the site is considered to be low risk to wildlife, the proposed height is not believed to add to the existing overall risk of strikes to wildlife. <p>13) place electric power lines underground:</p> <ul style="list-style-type: none"> ▪ All electric lines are to be placed underground. <p>B. The Lincoln Electric project was included in the submission DOE made to Region 3 with all proposed wind turbine projects in June 2010. LEC has committed to conduct post-construction monitoring from April 1 to November 15 of the first year of operation with an optional additional year depending on first year results. Any standardized post-construction monitoring protocols that result from that ongoing consultation would be reviewed and if determined appropriate and applicable and if time allows, would be implemented as part of Lincoln Electric’s post-construction monitoring.</p> <p>C. This statement will be revised to say that “the USFWS does not anticipate any direct or indirect impacts on the Indiana bat or other federally listed species.” We also added that DOE concurred with this finding.</p> <p>An additional and separate statement will be added that based on the analysis contained in the EA, significant impacts to avian species are not anticipated as a result of the proposed project.</p>
7.	State of Ohio Representative Kenny Yuko	Letter of support for installation of wind turbine as	Thank you for your comment

		being a green project and promoting economic development	
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Euclid Historical Society

21129 North Street
Euclid, Ohio 44117

VIA EMAIL: CAROLINE.MANN@EE.DOE.GOV

DOE Headquarters
c/o Caroline Mann
1000 Independence Ave, SW
Washington, DC 20585

July 21, 2010

To Whom It May Concern,

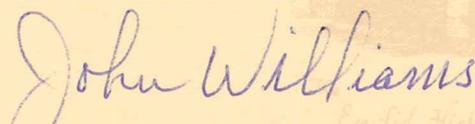
Re: Lincoln Electric Proposed Wind Tower on PPN 647-13-003

Members of the Board of Trustees of the Euclid Historical Society have reviewed the submitted Draft of the Environmental Assessment of the Lincoln Electric Wind Energy Project. We concur with the assessment, that there will be no detrimental environmental impact on any historic structures or sites in the area.

The views from any historic sites in the area will not be significantly altered by the wind turbine, and there are no below ground archeological features within the construction zone that would be adversely affected.

The Euclid Historical Society therefore supports the implementation of the 2.5 MW Wind Turbine on Permanent Parcel 647-13-003.

Sincerely,



John Williams, President
Euclid Historical Society

HistoricalSocietyWindTurbineLetr



COMMISSIONERS
Jimmy Dimora
Timothy F. Hagan
Peter Lawson Jones

July 22, 2010

Ms. Caroline Mann
United States Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

**Re: Public Comment on the Lincoln Electric Wind Energy Project
Euclid, Ohio (Cuyahoga County) - DOE/EA 1777**

Dear Ms. Mann:

The Board of Cuyahoga County Commissioners and the citizens we serve strongly support the Lincoln Electric Wind Energy project, which is to be sited at the company's world headquarters in the City of Euclid, Ohio.

The project offers a significant opportunity to install clean, renewable energy technology and promote economic development for the city, county and region. As just such a technology, wind energy will play an important role in America's efforts to achieve energy independence as well as economic growth and recovery. Once fully exploited, the benefits of wind energy will include cleaner air, reduced green house gases, diversified energy resources and thousands of new jobs.

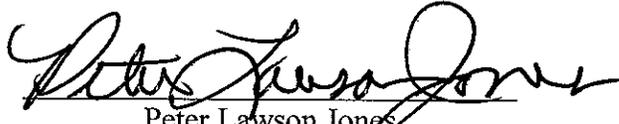
The Lincoln Electric wind turbine project embodies cutting-edge, sustainable, renewable technologies that will both help the company showcase its wind tower welding capabilities and generate clean electricity. The Lincoln Electric turbine installation will demonstrate the benefits of wind energy to the community and, hopefully, encourage turbine manufacturers to locate in Greater Cleveland and create new jobs.

Cuyahoga County is committed to promoting wind and advanced energy to revitalize our economy, improve air quality and encourage sustainable economic development. The county seeks to build on its research and manufacturing strengths to develop new wind energy technologies and produce component parts for wind turbines. The Lincoln Electric project presents a singular opportunity to fulfill this commitment.

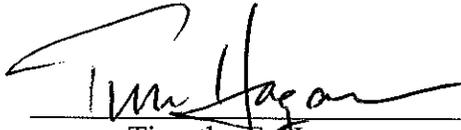
Ms. Caroline Mann
United States Department of Energy
July 22, 2010
Page 2

Thus, we fully support Lincoln Electric's efforts to generate clean renewable electricity and, in fact, are already working with the company to install the 2.5 MW wind turbine. The County is proud to partner with a major corporate citizen that is willing to assume a leadership role and take bold steps to make clean, renewable energy a reality.

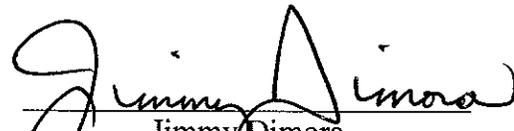
Sincerely,



Peter Lawson Jones
President



Timothy F. Hagan
Vice President



Jimmy Dimora
Commissioner



585 East 222nd Street, Euclid, OH 44123-2099

www.cityofeuclid.com

VIA EMAIL: CAROLINE.MANN@EE.DOE.GOV

July 20, 2010

DOE Headquarters
c/o Caroline Mann
1000 Independence Avenue SW
Washington, DC 20585

Re: American Recovery and Reinvestment Act 2009 (ARRA)
Lincoln Electric Wind Turbine Project (PRJ13813844)
East 222nd Street, Euclid, Ohio

Dear Ms. Mann:

The subject lot on which the 2.5 MW wind turbine is proposed is in a U-6 Industrial and Manufacturing zoning district.

There is a general expectation that within an industrial area that various uses and equipment may have impacts and establish an aesthetic which would not be acceptable generally in the non-industrial areas of a community.

In this case, a review of the Environmental Assessment of the Lincoln Electric Proposal indicates that:

- 1) There are no above ground historic sites affected by the view of the proposed tower.
- 2) There is no below ground archeological site within the construction area of the tower.
- 3) The tower will not present a significant detriment to the viewed landscape from the CLG historic inventory sites.

The Euclid Landmarks Commission concurs that the proposed 2.5 MW Lincoln Electric Wind Turbine Project does not represent a significant impact on local historic structures; the Commission therefore fully supports the implementation of this project.

Sincerely,

Roger A. Kelly, Chair
Euclid Landmarks Commission



www.cityofeuclid.com

585 East 222nd Street, Euclid, OH 44123-2099

Bill Cervenik, Mayor
Phone: 216/289-2751
Fax: 216/289-2766

July 21, 2010

DOE Headquarters
c/o Caroline Mann
1000 Independence Avenue, SW
Washington, DC 20585

Re: DOE's Proposed Financial Assistance to Ohio for Lincoln Electric's Wind Energy Project
Euclid, Cuyahoga County, Ohio – DOE/EA 1777

The City of Euclid, Ohio is proud to be in full support of the Lincoln Electric planned 2.5 MW wind turbine to be erected at their world headquarters site in Euclid, Ohio. This project not only represents a unique opportunity for The Lincoln Electric Company and the Wind Tower Welding Solutions sector of the company, but also a unique opportunity for the City of Euclid. It is anticipated to spur job growth, strengthen our region's advanced energy business sector and to help promote clean energy.

The Lincoln Electric Company is the City of Euclid's largest employer. Its Euclid based employees contribute significantly to the economy of the City. Reducing the company's carbon footprint, increasing their energy efficiency, strengthening their balance sheet and promoting a new business sector for our City's largest employer are of vital importance to our community.

The location of the project on the Lincoln campus also presents the advantage of a large available site in an otherwise built out community. This allows the construction of a utility scale wind turbine in an industrial urban setting on one of few sites located in the City where such a scale is feasible. This turbine will be seen from one of our region's most travelled routes, Interstate 90, and as such will do much to promote the use of wind power for our region.

This project also complements with the City of Euclid's efforts to promote energy efficiency, alternative energy, environmental stewardship and the expansion of the advanced energy business sector within our industrial belt. The City's own 'Going Green!' initiative will be bolstered by this project. The planned installation of photovoltaic solar systems on both Euclid City Hall and the Euclid Public Library, as well as the promotion of Property-Assessed Clean Energy (PACE) to our commercial property owners; ecological restoration on our waterfront, brownfield remediation and the advancement of an 80-acre business park with a minimum LEED Silver designation will all be complemented by this project.

The local review and approval of this project has been and will continue to be an open and transparent process. The City has included information regarding this project in newsletters, community meetings, formal public meetings, public notices and on the local government channel and City website. From the

City's perspective, this project will become a local landmark that will help define our City and our region as a forward thinking, environmentally conscious and innovative community.

Again, the City of Euclid fully supports the planned construction of a 2.5 MW wind turbine on the proposed site of The Lincoln Electric Company's world headquarters. If you have any questions or concerns please feel free to contact me at bcervenik@cityofeuclid.com or at (216) 289-2751.

Sincerely,



Bill Cervenik
Mayor

c: File

MARCIA L. FUDGE
11TH DISTRICT, OHIO

COMMITTEES:
SCIENCE AND TECHNOLOGY
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VICE CHAIR
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EDUCATION AND LABOR
HEALTH EMPLOYMENT LABOR AND PENSIONS (HELP)
SUBCOMMITTEE
HIGHER EDUCATION, LIFELONG LEARNING
AND COMPETITIVENESS SUBCOMMITTEE

E:MAIL VIA WEBSITE:
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July 24, 2010

Ms. Caroline Mann
DOE Headquarters
1000 Independence Ave. SW
Washington, DC 20585

Dear Ms. Mann,

I write in support of the Lincoln Electric 2.5 MW wind turbine project at the company's world headquarters facility in the City of Euclid, Ohio. The project represents a significant opportunity to install clean renewable energy technology and promote economic development Northeast Ohio region.

Wind energy is a clean renewable technology that plays an important role in America's energy independence and economic growth and recovery. When full exploited, benefits of wind energy will include cleaner air, reduced green house gases, diversified energy resources, and thousands of new jobs.

The Lincoln Electric wind turbine project embodies cutting-edge, clean, renewable technologies that will help Lincoln Electric highlight its wind tower welding capabilities and generate clean electricity. The Lincoln Electric turbine installation will demonstrate the benefits of wind energy to the community and, hopefully, encourage turbine manufacturers to locate in Greater Cleveland and create new jobs.

As a Member of the House Committee on Science and Technology, I am committed to promoting wind and advanced energy to revitalize our economy, improve air quality and encourage sustainable economic development. I believe that Northeast Ohio has the ability to build on its research institutions and manufacturing base to develop new wind energy technologies and produce component parts for wind turbines.

The Lincoln Electric project is an opportunity to fulfill this commitment. I am proud to be able to support Lincoln Electric's proposal, both as a advocate for wind energy and as the Representative of Ohio's Eleventh Congressional District.

Sincerely,

A handwritten signature in black ink that reads "Marcia L. Fudge". The signature is written in a cursive, flowing style.

Marcia L. Fudge
Member of Congress

**Megan
Seymour/R3/FWS/DOI**

To Megan_Seymour@fws.gov

08/3/2010 11:47 AM

cc caroline.mann@ee.doe.gov
Jeff Gosse/R3/FWS/DOI@FWS,
Tracy_Engle@URSCorp.com,
Keith.Lott@dnr.state.oh.us

SubjectDraft EA for the Lincoln Electric

Wind Energy Project

Dear Ms. Mann,

I wanted to update my e-mail below and inform you of an error. I incorrectly identified that the proposed project was located within an Important Bird Area. This statement was included in our letter dated April 26, 2010 and I included that statement below, however that is not correct. The project area is NOT within an Important Bird Area. It is however, within approximately 2.2 miles of Lake Erie, which is an area of concern relative to migratory birds. I apologize for the error--please let me know if you have questions or would like to discuss further.

Sincerely,
Megan

Megan Seymour
Wildlife Biologist
U.S. Fish & Wildlife Service
4625 Morse Rd.
Suite 104
Columbus, OH 43230
(614) 416-8993 ext. 16
(614) 416-8994 fax
Megan Seymour/R3/FWS/DOI

**Megan
Seymour/R3/FWS/DOI**

To caroline.mann@ee.doe.gov

07/23/2010 10:57 AM

cc Jeff Gosse/R3/FWS/DOI@FWS,
Tracy_Engle@URSCorp.com,
Keith.Lott@dnr.state.oh.us

SubjectDraft EA for the Lincoln Electric

Wind Energy Project

Dear Ms. Mann,

I have reviewed the Draft EA for the Lincoln Electric Wind Energy Project, as noticed below. This project involves the installation of a single 2.5 MW turbine in Euclid, Cuyahoga County, Ohio. The project area is industrial in nature and will involve impacts to a maintained grass area. The U.S. Fish and Wildlife Service (Service) submits the following comments on the Draft EA:

1. The Service provided a letter in response to your initial request for information on this project on April 26, 2010 (included as Appendix C-4). In this letter we detail our position regarding migratory birds, and outline specific actions that can be taken to avoid and minimize potential impacts to migratory birds, particularly because the project is located within approximately 2.2 miles of Lake Erie and is located within the boundaries of an Audubon- designated Important Bird Area. No mention of migratory birds or measures to protect migratory birds was included in your Draft EA. Section 3-2 of the Draft EA states that "USFWS does not anticipate any direct or indirect impacts on the Indiana bat or and other avian or wildlife species as a result of the proposed project." This statement is not accurate relative to migratory birds. The Service's letter recommended "Careful consideration of the guidelines below to protect migratory birds..." and provided a list of relevant guidelines. The EA should address the Service's comments regarding migratory birds, and should indicate which of the recommended guidelines are being implemented to protect migratory birds.

2. We note and appreciate your commitment to implement post-construction monitoring to document any impacts to birds and/or bats from operation of the proposed turbine. The Service's Region 3 Wind Power lead Jeff Gosse has been in contact with DOE's NEPA coordinator in Colorado about programmatically addressing potential impacts to birds and/or bats from small/single wind turbine projects. This may include development of a standardized post-construction monitoring protocol for these types of projects. We encourage you to consider using this approach on this project, by implementing a standardized post-construction monitoring protocol. Further coordination with DOE's NEPA coordinator in Colorado and our Region 3 office is recommended.

Thank you for the opportunity to review this document. If you have any questions or concerns please contact me.

Sincerely,

Megan Seymour

Wildlife Biologist

U.S. Fish & Wildlife Service

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Columbus, OH 43230

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Marge_Gudat@URSCorp.com

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07/09/2010 08:05 AM

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ccJim_Burns@URSCorp.com,
Tracy_Engle@URSCorp.com

SubjectNotice of Availability

(See attached file: NOTICE OF AVAILABILITY.doc)

James F. Burns, PWS, URS Certified Project Manager
Senior Environmental Scientist
URS Corporation
Architects, Engineers, and Planners
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Cleveland OH 44115
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Email: Jim_Burns@urscorp.com

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(See attached file: NOTICE OF AVAILABILITY.doc)



Kenny Yuko
State Representative

7th House District
Parts of Cuyahoga County

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fax: (440) 461-6901

Capitol Office

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District07@ohr.state.oh.us

Committees

Commerce and Labor -
Chair

Faith Based Initiatives

Health

Local Government/ Public
Administration

Transportation

**Special
Committees**

Unemployment Compensation
Advisory Council

Labor Management
Government Advisory Council

July 23, 2010

DOE Headquarters
c/o Caroline Mann
1000 Independence Avenue, SW
Washington, DC 20585

Re: Proposed financial assistance for Lincoln Electric's Wind Energy Project in Euclid, OH - DOE/EA 1777

I am writing to express my excitement about a potential project in my House district. Recently the Lincoln Electric Company, working in concert with the City of Euclid, embarked on the journey of bringing wind energy to Northeastern Ohio.

As you know, wind energy is an important piece of the green energy trend that has been sweeping the Nation. Euclid has demonstrated its commitment to reducing its carbon footprint by enacting the *Going Green!* initiative. This initiative includes installing solar panels on City Hall and the Public Library, as well as advocating for the ecologically sensitive restoration of their waterfront and remediation of brownfields within the city limits.

Now Lincoln Electric is preparing to erect a 2.5 MW wind turbine at its world headquarters here in Euclid. The wind turbine project would not only complement the city's dedication to environmental stewardship, but would also contribute significantly to the economy. I can't tell you how much this would do for the City of Euclid and all of Northeastern Ohio. Simply put, it would mean jobs, tax revenues and hope that we are pulling out of the economic downturn that has had such a devastating effect on my community.

I enthusiastically support this project because I believe it has the capacity to change the lives of many hardworking Ohioans and it gives Euclid the opportunity to define itself as a front runner in the alternative energy sector.

Sincerely,

A handwritten signature in black ink that reads "Kenny Yuko".

Representative Kenny Yuko
7th Ohio House District