

Damon, Jessica

From: Stratton, Robert D
Sent: Wednesday, March 18, 2020 3:59 PM
To: michael.carey@swebdevelopment.ca
Cc: Damon, Jessica; Perry, John; Todd, Charlie; Dunham, Steve; Mahaney, Wende; tbrochu@ces-maine.com
Subject: Silver Maple Wind curtailment season

Good afternoon Mike,

I am writing to follow up on our communications related to turbine curtailment to protect at-risk bat species at the proposed Silver Maple Wind (SMW) Project in Clifton, Maine and to address MDIFW's recommendation on the appropriate length of the curtailment season related to wintering habitats nearby. As I mentioned, I have been communicating with MDIFW's bat specialists, who have been consulting research and other experts on the timing of fall swarming in the vicinity of winter hibernacula, talus features, and rocky outcrops, as well as the timing of spring emergence from such habitats. When occupied habitats of these types are in proximity to wind projects, the bats are at greater risk during the referenced spring and fall periods. Hence, the need for appropriate turbine curtailment. Instead of editing your March 4, 2020 draft language as you requested, I think it is more appropriate to direct you to the relevant language in MDIFW's Wind Power Guidance, which we have cited in Department correspondences on SMW, so that you can formulate your proposal accordingly.

As noted in the Wind Power Guidance, *"in most circumstances based on current research and recent project reviews, MDIFW recommends that turbines operate only at cut-in wind speeds exceeding 6.0 meters per second each night (from at least ½ hour before sunset to at least ½ hour after sunrise) during the period April 15 –September 30, whenever the ambient air temperature is at or above 32 degrees Fahrenheit, measured at both ground level and nacelle hub height. Proximity to hibernacula, documented maternity sites, rocky features, the coastal mainland, and migration patterns, may increase risks and thus possibly necessitate additional safeguards, such as extended timeframes (earlier and/or later) and/or higher wind speeds."* *"Additionally, based on higher bat mortality during July – September demonstrated through post-construction project monitoring in Maine and research elsewhere, applicants can anticipate a need for increased curtailment wind speeds during this period."* We have discussed various scenarios for this late summer increased curtailment period, with and without an Incidental Take Permit. As I recall, you recently indicated that you intend to incorporate an increase to 6.5 m/s during this period. In reference to potential wintering habitats for bats, we discussed that resource maps of wildlife habitats/ecological systems drawn from the Northeastern Terrestrial Habitat Classification System indicate the presence of at least 18 areas of talus slopes and rocky outcrops of varying size within a three-mile radius of the proposed Silver Maple Wind project site. These areas have not been investigated but, winter activity has been confirmed for little brown bats (*Myotis lucifugus*) and eastern small-footed bats (*M. leibii*) at Eagle Bluff in Dedham, located approximately 2.5 miles away. As previously noted, MDIFW anticipates the presence of other at-risk bat species in the vicinity.

MDIFW's Wind Power Guidance describes general turbine curtailment recommendations and notes that the presence of habitats such as those described above in proximity (within 3 miles) *"may increase risks and thus possibly necessitate additional safeguards, such as extended timeframes (earlier and/or later) and/or higher wind speeds"* for curtailment. Accordingly, based on conditions at and in the vicinity of the proposed project site, MDIFW recommends a turbine curtailment season for SMW from April 1 through October 31. During the expanded April 1 to April 14 and October 1 to October 31 periods, MDIFW recommends that turbines operate only at cut-in wind speeds exceeding 6.0 meters per second pursuant to time of day and ambient temperature provisions cited above.

Please let me know if you have any questions or concerns on this issue. Thank you, Bob.

Bob Stratton

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