



Natural Resources Council of Maine

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February 22, 2016

Jessica Damon, Program Manager
Maine Department of
Environmental Protection
17 State House Station
Augusta, ME 04333-0017

Kellen Ingalls, Development
Project Manager
EDP Renewables
541 Main St., Suite B
Presque Isle, ME 04769

RE: Number Nine Wind Farm

Dear Ms. Damon and Ms. Chapman:

We are writing to share our concerns regarding the Number Nine Wind Farm as currently proposed. The Natural Resources Council of Maine supports wind power development and believes that it is an important energy source that does not emit climate-changing carbon pollution. We recognize that wind projects can cause site-specific impacts on wildlife and natural resources. For that reason, we strongly encourage wind developers to work closely with state and federal natural resource agencies to make every effort to site, design, and operate projects in a fashion that minimizes impacts to high value natural resources.

The Number Nine Project appears to be well sited from the perspective of minimizing impacts on scenic and recreational resources and avoiding sensitive natural resources found in higher elevation locations. However, the large size and geographic scope of the project poses other potentially significant impacts on high value natural resources—as noted by comments submitted to the Maine DEP by the Maine Department of Inland Fish and Wildlife (DIFW). The U.S. Fish and Wildlife Service (USFWS) also has strong concerns about potential impact of the project.

We take the concerns that have been expressed about the Number Nine Project by state and federal natural resource agencies very seriously. Based on discussions that our staff has had with representatives of these agencies, we do not believe that sufficient effort has been made to-date by the applicant to address those concerns in order to avoid, minimize and mitigate potential impacts. Specifically, we note that the project would be located in Canada lynx critical habitat. As noted in DIFW comments, the project could have significant impacts on nocturnal avian migrations and on bat populations, including three species listed as critical or endangered. The project is located near a great blue heron rookery. The project area includes Atlantic salmon streams, significant vernal pools, inland wading and waterfowl habitat, brook trout streams, significant deer wintering areas, and other potential natural resources and wildlife of concern.

Wind power developers have a high burden of responsibility—and, indeed, a legal obligation—to avoid significant adverse impacts on Maine’s natural resources. We do not believe that the project, as currently proposed, meets that test.

We understand that DIFW has offered advice on a number of project modifications that would help avoid, minimize, and mitigate potential impacts on resources of concern, but that advice largely has been ignored. Based on our current understanding of the project, we believe the applicant needs to include further modifications in the project—with a careful look at curtailment options to reduce impacts on bat and bird populations; size and location of turbines to reduce impacts on wildlife habitat and sensitive ecosystems; and pre, during and post-construction monitoring studies to determine the impacts of the project.

NRCM will continue to follow this project as it moves through the permitting process, and we will be looking for progress by the applicant in meeting concerns raised by DIFW and USFWS regarding potential impacts on natural resources. To receive a permit, the project must meet the standard of no undue adverse impact. We believe more work will be needed by the applicant to meet this test.

We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dylan Voorhees', written in a cursive style.

Dylan Voorhees
Clean Energy Director
Natural Resources Council of Maine

CC: MDIFW

USFWS