To: Maine Land Use Planning Commission
From: Violetta Wierzbicki
Subject: Milton Township Substantive Review of a Petition
Date: June 21, 2016

My name is Violetta Wierzbicki and I reside at 45 Sierra Dr in Milton Township. I am writing this letter in response to expedited area petition substantive review process.
My goal is to demonstrate to the commission that Milton Township can meet both statutory criteria and should be removed from the expedited area.
First ,I would like to state how biased the 2007 Wind Energy Act is in favor of Wind Power Projects. Public Law 2015,Chapter 265,although temporary,may provide local residents with a chance to have a voice in difficult decisions related to future wind turbine projects in our community.

Milton Township covers a total area of 15 square miles, or 9.600 acres. According to the Maine Audubon Org ,there are 1.1 million acres in Maine that are viable for commercial wind development. 92% of this acreage has low wind speeds and is the focus of the wind developers. Only 15% of the acreage would have to be developed to meet the state goal of 3000 MW of land based energy by 2030. Of all the land that can be developed,only 16% overlaps with wildlife resources. Audubon Society strongly recommends avoiding wind power development in these areas. Milton is one of the very few territories where wind turbines should be avoided.

In 2011, White Nose Syndrome killed 90% of bats in Maine's 3 known hibernacula. In 2015,northern long eared and little brown bat have been listed as endangered and eastern small footed bat has been listed as threatened. Two out of the three hibernacula are located in Oxford county. One of the hibernacula is located 3.1 miles from the proposed MET tower in Milton. It is concerning to me that during the permitting process for the MET tower,the applicant ignored the concerns of LUPC representatives and refused to meet with them. It is clear that wildlife habitat is not a priority to EverPower developer,but it should be to us. Furthermore, Spruce Mountain Wind Project, already has a negative impact on bat population. Unfortunately, the impact of bat mortalities was recognized post-construction.

The state of Maine did not reach it's goal of 2,000 MW by 2015. The report of Maine Energy Development Assessment, prepared by Governor's office in March of 2012, actually suggested eliminating the statutory goals knowing they were not realistic. The state target by 2030 is 3,000 MW on shore and 5,000 MW offshore. There are no offshore projects in Maine as of today. The facts above clearly proves that Milton will have no unreasonable adverse effect of the state's ability to meet the state goals. (criterion A)

Next I would like to show that the removal of Milton from the expedited area is consistent with the principal values and goals in the Comprehensive Land Use Plan. (criterion B)

- "Vacationland"
- "The way life should be"
- "There is more to Maine"

These are some Maine state slogans. Lets not forget that tourism is the largest industry in the state of Maine. Over 170,000 jobs, 3.8 billion in payroll and 13 billion in sales and services. These numbers directly affect people from local communities.In contrast, according to " Wind

For Maine Advocacy Group", wind power companies spent 532 million on projects in Maine over the past 8 years and created about 1500 jobs mostly during construction periods. But many profits from wind farm construction are not shared within the state. We have to make sure that in the process of developing wind power ,we don't lose something that is much more important - TOURISM.

Milton is located in close proximity to many ponds,hiking trails,ATV/snowmobile trails and major ski areas,especially Sunday River. The negative impact on scenic and recreational resources in the area would be considerable. The proposed wind project in Milton would be visible for miles on Rt 2, traveling toward Sunday River.Rt 2 and Rt 232 are very scenic along the Androscoggin River. Tourists come to Maine for the tranquility and the natural beauty of the outdoors. No one will want to vacation among the noise and the flicker of the wind turbines.

Another major concern for many local residents is the loss of real estate value associated with the proximity to wind projects. Many studies show 25% to 65% loss. That would make many properties unsalable.

In conclusion I would like to stress again that removing Milton from expedited area does not eliminate wind power development in the future but rather it ensures that the process will include the voice of local residents who may have to live among the turbines. In the expedited wind law,rights to the public hearing were removed so the citizens had no weighted say in what occurred in their own communities. The Commission has a very difficult but also very important role to assure that the process for wind power development in unorganized territories is fair-minded and in the best interest of both parties involved. Please don't take the only opportunity of having a voice away from us.

Sincerely,

Violetta Wierzbicki

From: violetta.w@verizon.net
To: Beyer, Stacie R
Subject: Re: Substantive Review_MiltonTwp_
Date: Wednesday, June 29, 2016 9:36:10 AM

Stacie,
I would like to share links that I have used in writing my letter to the commission. I think they are worth reading before making decisions in the future.
1. Wind Power and Wildlife in Maine, by Maine Audubon.***maine****audubon.org/****wildlife****-habitat/****wind****-****power****-****and****-****wildlife***
2.http;/digitalcommons.colby.edu-cgi-view content.cgi?article=1795On 05/19/16, Beyer, Stacie R<Stacie.R.Beyer@maine.gov> wrote:

Good morning,

The Land Use Planning Commission has completed the first procedural order for the substantive review of the petition to remove Milton from the Expedited Permitting Area for Wind Energy Development. This is in follow-up to the pre-hearing meetings that we held with petition circulators and substantive review requestors. Hard copies of the procedural order will be sent to interested persons by regular mail tomorrow afternoon.

If you have any questions about the procedural order or substantive review process, please feel free to contact me.

Thank you.

Stacie R. Beyer

Chief Planner, Acting Capacity

Land Use Planning Commission

106 Hogan Road, Suite 8

Bangor, ME 04401

207-941-4593

From: Violetta
To: Beyer, Stacie R
Subject: Milton review
Date: Wednesday, June 29, 2016 4:18:43 PM

Wind Power and Wildlife in Maine:

A State-wide Geographic Analysis of High-Value Wildlife Resources and Wind Power Classes

page1image5480

page1image5648

page1image5816

page1image5984

Susan Gallo,Wildlife Biologist

Maine Audubon, December 2013

Sent from my iPhone

From: Violetta
To: Beyer, Stacie R
Date: Wednesday, June 29, 2016 4:25:53 PM

This work was funded in part by the Orchard Foundation. We thank Chris Kittredge for many hours of help with the geographic analysis and for creating all the maps included in this report. We appreciate the staff at First Wind and Iberdrola for their input on our initial analysis. Dylan Voorhees (Natural Resources Council of Maine) and David Publicover (Appalachian Mountain Club) both provided valuable input on all phases of analysis and reporting. Mike Thompson (Penobscot Environmental) provided helpful editorial suggestions for the final report.

Executive Summary

This report analyzes, on a broad, state-wide scale, how much acreage in Maine has both wind and wildlife resource value, compared to how much acreage has wind without an overlapping natural resource value, in order to evaluate the potential for wind development that minimizes impacts to a broad array of wildlife habitat. This report also evaluates the state's goal of 3,000 MW capacity of wind energy by the 2030 deadline set in the amended Maine Wind Energy Act, and if that level of development can happen with minimal impact to multiple wildlife resources.

This report finds:

- The wind resource in Maine is extensive. There are 1.1 million acres with viable wind (>300 W/m^2) located away from developed areas, established conservation land and excessively steep slopes (>20% grade). As expected, the higher wind power classes are located at higher elevations.

- Most wind projects in Maine have been built where there are relatively low levels of wind (<500 W/m^2). Increasingly longer blades and taller towers have made these sites economically viable.

- Wildlife resources are widely distributed across the state and across the wind resource base. A few wildlife resources, including Rare/Exemplary Natural Communities, Critical Summits and Bicknell's Thrush, have substantial overlap with the higher wind classes.

- Only 16% of the modeled wind base (177,000 acres) overlaps with any of the wildlife resources analyzed in this report. That leaves 84% of the modeled wind base (933,000 acres) with the potential for fewer and less severe impacts on wildlife, though this analysis does not eliminate the need for site specific analysis of impacts.

- Acreage that overlaps with the modeled wind base is disproportionately split between the expedited and non-expedited permitting areas, with almost twice as many acres in the expedited permitting area vs. non-expedited permitting area overlapping with the wildlife resources analyzed here.

- All of the wildlife resources included in this analysis have the potential to overlap with wind developments as they are proposed, though those overlaps could be minimized or

avoided

Sent from my iPhone

From: Violetta
To: Beyer, Stacie R
Date: Wednesday, June 29, 2016 4:36:00 PM

altogether with proactive planning and thoughtful layout and design of wind project developments.

- Coastal areas take up a large part of the modeled wind base, especially in the lowest wind power classes. There are approximately 1.5 million acres within two miles of the coast, which is 7% of the land base but contains 13.5% of the wind resource and just over 41% of the wildlife resources mapped in this analysis.

- Based on this analysis, it appears there is adequate wind in the expedited permitting area that does not overlap with mapped wildlife resources to meet the State goal of 3,000 MW capacity of wind energy.

- For future wind developments in Maine, Maine Audubon recommends :

o Siting new wind projects in the expedited permitting area away from known and valuable

wildlife resources, including but not limited to those analyzed in this report.
o Siting new wind projects to first avoid, then minimize impacts, with the last resort to

mitigate wildlife impacts only if absolutely necessary.
o Avoiding high elevation sites with Rare/Exemplary Natural Communities, modeled

Bicknell's Thrush Habitat, as well as those areas designated as Critical Summits.

o Careful analysis of any new wind projects within two miles of the coast, due to the high potential for overlap with known wildlife resources.

There are numerous limitations to the analysis used in this report and to the interpretations of the findings presented here. We recognize that the siting of wind development is a complex process, involving, among other things, multiple landowners, meteorological and geophysical assessments, permit applications, biological surveys and studies of visual and other impacts. The value of wildlife and wildlife resources is just one of many concerns that need to be considered as wind development projects move forward.

The wind data used for this analysis, although mapped on a fine scale, is a model based on a much coarser scale. Actual, on-site measurements of wind power may be different. Maps created in this report should not be used for any site-specific analysis of siting. We have analyzed wildlife resources for which there was good information available. Not all wildlife resource values have been adequately mapped and there are wildlife values for which we lack geographical information. These other wildlife resource values will need to be assessed as new wind developments move forward in Maine.

Sent from my iPhone