

Attn: John Perry
Maine Department of Inland Fisheries and Wildlife
284 State St
Augusta, ME 0433

January 13, 2020
Dear Mr. Perry,

We appreciate the opportunity to continue to engage with your team at the Department of Inland Fisheries and Wildlife (IF&W) on these issues. We at SWEB are confident that we are close to agreeing on a mitigation strategy for the project. Please find below our responses to your December 11, 2019 letter.

1. Project location in relation to the Coastal Plain

It remains the understanding of the development team that the project area is located outside of the Downeast Coastal Plain. We have reached this conclusion using a map provided by the IF&W at a 2018 meeting with our environmental consultant, CES Inc. While our project area falls south of Route 9, we feel that the IF&W's rationale for assuming the project is at or within the threshold of the Coastal Plain would be overly conservative, and out of step with any real risk related to avian species. Especially given the relatively small size of our proposed cumulative swept area, in relation to several other recently permitted wind projects in Maine. As of the submission date of this project, and the writing of this letter, the IF&W's own published work indicates that our project area is safely outside of this region.

2. Bat Curtailment

While it is the opinion of the developer that the risk of bat mortality as a result of the Silver Maple Wind Project is low, SWEB Development nonetheless understands the unique situation of Bat species in Maine, and is willing to instate curtailment as good measure. Through observation of other wind farms in Maine, such as the recently approved Weaver Wind Project, SWEB considers a curtailment regimen of a cut-in speed of ~6.00 meters per second (m/s) during the Bat Migration season (July through mid-September), and a general curtailment of 5.5 m/s from April through October 15th. This level of curtailment would be the threshold at which the economics of the five (5) turbine Silver Maple Wind Project start to make sense. It is also very close to the curtailment regime required for the recently approved Weaver project, which consists of 22 turbines, versus only 5 at Silver Maple.

3. Watercourse Buffers

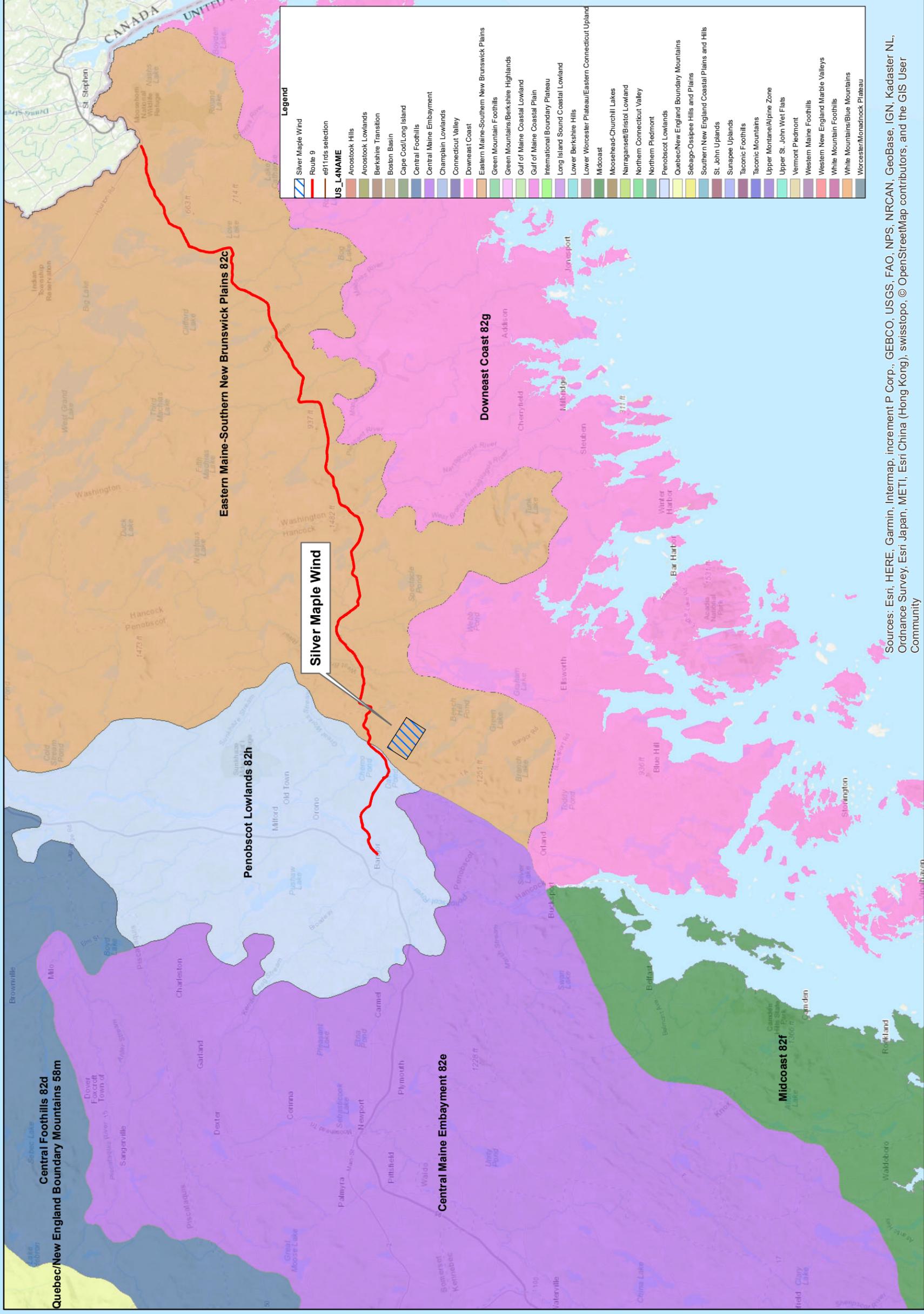
It is the understanding of the applicant, that our current plan to mitigate impact on watercourses is in compliance with the standards set out by the Maine DEP. The project will utilize one roadway crossing as it currently exists and will upgrade another existing roadway crossing. The proposed upgrade of the existing crossing meets the requirements of the MDEP permit-by-rule regulations and will have minimal impacts. All other buffer areas associated with any intermittent streams located within the project site will remain undisturbed. By utilizing existing crossings, the proposed project has minimized any impacts to the identified intermittent streams.

Sincerely,



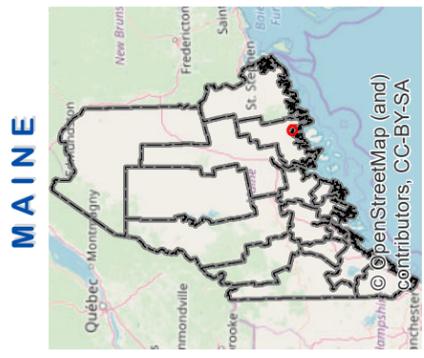
Michael Carey
Development Manager
SWEB Development USA, LLC

Silver Maple EPA Ecoregions Map



Legend

- Silver Maple Wind
- Route 9
- 6911ds selection
- US_LANAME
- Aroostook Hills
- Aroostook Lowlands
- Berkshire Transition
- Boston Basin
- Cape Cod/Long Island
- Central Foothills
- Central Maine Embayment
- Champlain Lowlands
- Connecticut Valley
- Downeast Coast
- Eastern Maine-Southern New Brunswick Plains
- Green Mountain Foothills
- Green Mountains/Berkshire Highlands
- Gulf of Maine Coastal Lowland
- Gulf of Maine Coastal Plain
- International Boundary Plateau
- Long Island Sound Coastal Lowland
- Lower Berkshire Hills
- Lower Worcester Plateau/Eastern Connecticut Upland
- Midcoast
- Moosehead-Churchill Lakes
- Narragansett/Bristol Lowland
- Northern Connecticut Valley
- Northern Piedmont
- Penobscot Lowlands
- Quebec/New England Boundary Mountains
- Sebago-Osipee Hills and Plains
- Southern New England Coastal Plains and Hills
- St. John Uplands
- Sunapee Uplands
- Taconic Foothills
- Taconic Mountains
- Upper Montane/Alpine Zone
- Upper St. John Wet Flats
- Vermont Piedmont
- Western Maine Foothills
- Western New England Marble Valleys
- White Mountain Foothills
- White Mountains/Blue Mountains
- Worcester/Monadnock Plateau



Project Title: Silver Maple Wind Farm
Project Description: Ecoregions Map
Address: Route Clifton, Maine

Project No.: 11657.006
 By: NAI
 Date: 6/28/19
 Updated: 6/28/2019
 By: [ireland]

MAP NOTES:

1. AERIAL PHOTO BASE MAP FROM IMAGERY IS 1-M 2013 NAIP IMAGERY BY USDA, FSA, TOPOGRAPHIC QUAD FROM ESRI, 2015.
2. MAP IS PROJECTED USING UTM ZONE 19 COORDINATES, AND REFERENCES THE NORTH AMERICAN DATUM OF 1983 (NAD83).
3. NORTH ARROW IS ORIENTED TO GRID NORTH IN ALL MAP EXTENTS DEPICTED HEREIN.



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community