

September 30, 2020
Jessica Damon
Maine Department of Environmental Protection
106 Hogan road
Bangor, ME
04401

Michael Carey
Development Manager
SWEB Development USA, LLC
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Re: Silver Maple Visual Impact and Mitigation

Dear Jessica Damon,

As you know, we are working diligently on finding a feasible method to mitigate any potential visual impact of the Silver Maple Wind Project. As recommended by Jim Palmer in his September 11th document (Review: Addendum for the Silver Maple Wind Farm Visual Impact Assessment) the incorporation of FAA approved radar lighting on the Silver Maple Wind Project as well as on the adjacent Pisgah Mountain Wind Project would, in his opinion, achieve such a mitigation or even provide for a cumulative impact that may be lower than the existing or proposed scenic impact. SWEB has explored this option with the owners of Pisgah Mountain, LLC, who own and operate the Pisgah Mountain wind project.

Resulting from said discussions SWEB suggests that the DEP consider requiring SWEB to commit to deploying to the Silver Maple wind farm either

- a.) an FAA approved radar lighting system; OR
- b.) an FAA approved lighting mitigation system, which shall ensure no unreasonable scenic impact of the project on scenic resource of state or national significance;

as well as to ensure that

- i.) a similar mitigation system will be deployed by Pisgah Mountain, LLC to its Pisgah Mountain wind project within one year of the commencement of commercial operations of the Silver Maple wind farm;

All of the above subject to receiving Federal Aviation Administration (FAA) approval.

This will allow both SWEB Development and Pisgah Mountain, LLC to explore non-radar alternatives, which are currently under review by the FAA, and are expected to be commercially available by the time the Silver Maple project is erected.

We understand and are referring to the fact that the DEP has in previous decisions (e.g. in the case of the Weaver Wind, LLC project) anticipated the existence of alternative available technologies that may reduce the visual impacts of night lighting.

These alternatives include a light dimming system, or LIDS (Light Intensity Dimming Solution) which is currently under review by the FAA. Please find attached additional information on this product, which will dim nighttime lighting in accordance with weather conditions.

The ultimate goal of any such system will be the mitigation of the potential visual impact of the Silver Maple Project, but we encourage the DEP to consider conditioning the Silver Maple Wind Project to allow for newer and potentially more effective FAA approved technologies. We have also enclosed legislation recently passed in North Dakota, and proposed in 2020 in South Dakota, which supports this approach.

Sincerely,



Michael Carey
Development Manager
SWEB Development USA, LLC