

Maine Department of Energy Resources
62 State House Station
Augusta, Maine 04333

April 20, 2026

RE: Maine Audubon 2026 Energy Storage Draft RFP Comments

Dear Acting Commissioner Burgess:

Maine Audubon thanks the Maine Department of Energy Resources (DOER, Department) for the opportunity to submit comments on the Draft Request for Proposals (RFP) for the development of energy storage systems. Since 1843, Maine Audubon has worked to conserve Maine wildlife and wildlife habitat by engaging people in education, conservation, and advocacy. The oldest and largest Maine-based conservation organization, Maine Audubon has eight public centers and sanctuaries across the state; seven chapters; 30,000 members, volunteers, and supporters; and connects with more than 250,000 people annually.

Maine Audubon offers the following comments with the objective of aiding DOER to help ensure that the RFP for the development of energy storage systems addresses the need to rapidly deploy energy storage to support the buildout of clean and renewable energy, while also protecting natural areas from harm.

It is essential that renewable energy continues to be integrated into Maine's grid to further reduce Maine's reliance on fossil fuels. Energy storage is integral to Maine's commitment to securing a clean electricity grid and embracing a renewable energy future. As our grid incorporates more renewable energy, moment-to-moment variability and longer-term variability in the output of energy will require energy storage to compensate for lost production. Additionally, energy storage will be required to compensate for changes in demand as distributed energy resources become even more integrated with our grid. **As such, Maine Audubon supports the procurement of energy storage in order to help slow the rate of climate change.**

Siting Considerations

One challenge for the development of energy storage is where to site these systems in a way that minimizes environmental impacts. Maine Audubon commends DOER for incorporating environmental impacts into the draft RFP Section 3 and Section 5. Section 3 of the draft RFP favorably evaluates projects to the extent of which the project will avoid, minimize, and mitigate detrimental environmental impacts. In order for projects to best avoid, minimize, and mitigate detrimental environmental impacts, Maine Audubon respectfully offers the following guidance to incorporate into the final RFP or the evaluation process.

Projects should to the extent practicable avoid all sensitive habitats, including wildlife movement corridors and large blocks of relatively unfragmented or interior forest habitat. Prior to development, the project should conduct surveys to identify and understand local wildlife habitat and any potential impacts due to the proposed energy storage project. Projects should also evaluate potential cumulative impacts, taking into consideration existing development and future development for a site. Examples of cumulative impacts to be considered include the amount of impervious surface within a watershed, water use and recharge in a watershed, or road traffic within an area. Lastly, projects should prioritize re-using previously disturbed sites such as brownfields and choose sites that are located close to transmission corridors in order to reduce interconnection distances.

When avoidance is not achievable, projects should at all times minimize their impact on the environment. Projects should maintain existing native vegetation to the greatest degree possible and avoid impervious surfaces when possible. Where necessary, setting construction timeframes based on the behavior of potentially affected species such as migratory birds would help limit any impacts on wildlife, especially during migratory or breeding seasons. Lastly, if fences are used, the incorporation of wildlife-friendly fences are recommended in order to not impede the movement of wildlife.

When avoidance and minimization of environmental impacts cannot be achieved, proper mitigation is essential for reducing the environmental harms of a project. It is important to note that mitigation is a last resort option and projects should be evaluated more favorably for their avoidance and minimization efforts. While assessing impacts, consideration should be given to the specific species being impacted; the types of habitats being harmed; whether there are alternatives for lost habitat; the quality of the habitat being impacted; cumulative impacts; and landscape-level impacts. Additionally, mitigation should be calculated based on the full breadth of impacted acreage. Ideally, projects will first mitigate disturbances by conserving land elsewhere to compensate for the land that is being disturbed from the project. Newly conserved lands should be of the same habitat type, of the same quality or better, and preferably in the same region as the project. If that is not possible, there are compensatory mitigation options that projects should propose. These options include compensation for permanent land protection, habitat restoration, habitat management, funding for biological research, or in-lieu fee programs.

Maine Audubon hopes that this guidance can be incorporated into the RFP process and suggests that the Department review our report, [Renewable Energy and Wildlife in Maine](#) for more detailed guidance.

Decommissioning

In addition to the siting and construction of the site, the environmental impacts of decommissioning energy storage projects should be taken into account when reviewing proposals. Maine Audubon agrees with the Department that Environmental Impact Assessment Plans must include a plan for

decommissioning and removal of the facility at the end of its life. However, in addition to the requirements of 35-A M.R.S. §3499, it would be beneficial that decommissioning plans include the restoration of any disturbed wildlife habitat.

Auxiliary Benefits

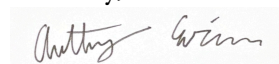
Section 3.3.2 of the Draft RFP outlines the qualitative factors that the Department will use to review project proposals. Importantly, the Department will include the evaluation of auxiliary benefits, including the environmental value of the projects such as avoided emissions. Maine Audubon strongly believes that developers should strive to create projects that provide a net benefit for wildlife and these actions should be evaluated as auxiliary benefits. Specifically, projects could propose to incorporate habitat restoration and enhancement into their plans. Replacing invasive vegetation with native species, creating early successional habitat, incorporating pollinator habitat, or even restoring nearby degraded wetlands are all benefits that projects could provide when constructing storage facilities. Improving the land is always a good option and Maine Audubon urges the Department to include this language into its RFP for evaluating auxiliary benefits of energy storage.

In addition to providing net benefits for wildlife, energy storage projects have the potential to reduce the need for new transmission infrastructure and additional energy generation by providing storage for excess energy. By strategically siting storage, the state can provide capacity to areas with growing demand without the need to build new transmission or energy generation. DOER should incorporate this benefit when evaluating Auxiliary Benefits and should take into account whether a project may help reduce the need for future energy projects.

Conclusion

Climate change is the most pervasive threat facing the wildlife of Maine. Rising temperatures, changing precipitation patterns, and increasingly frequent extreme weather events due to changes in climate are negatively altering the habitat and behaviors of countless species that are vital to our state. **If we hope to protect all of Maine's important species and habitats, we must accelerate our transition to a cleaner, more sustainable energy future and the procurement of energy storage systems is a key component of making that future a reality. However, building out this future must be done responsibly so as to not place additional pressures on wildlife.** Maine Audubon hopes that these comments will help DOER in drafting its final energy storage RFP and evaluate potential projects in a wildlife responsible manner. Thank you for your consideration.

Sincerely,



Anthony Erwin
Policy Advocate