



Virginia Chapter of The Wildlife Society

Chartered October 15, 1982

MEMORANDUM

TO: Rocky Forge Wind, LLC c/o Apex Clean Energy, Inc

FROM: Aaron Proctor, Past-President, VA Chapter of The Wildlife Society

DATE: June 6, 2016

RE: Proposed Rocky Forge Wind Project

On behalf of the Virginia Chapter of The Wildlife Society, the principal organization representing wildlife professionals across the Commonwealth, I would like to submit the following comments regarding the proposed wind energy project in Botetourt County, Virginia. While we appreciate the efforts Apex Energy has made to receive input and address concerns associated with this project, we believe that additional actions and considerations are warranted. Our primary concern is direct mortality to birds and bats from turbines, but we also recognize the potential for forest habitat fragmentation and water quality impacts during and after construction.

The Wildlife Society (TWS), an international association of nearly 10,000 wildlife professionals and students dedicated to excellence in wildlife stewardship through science and education, has published a technical review (<http://wildlife.org/wp-content/uploads/2014/05/Wind07-2.pdf>) and a position statement (http://wildlife.org/wp-content/uploads/2016/04/PS_ImpactsofWindEnergyonWildlife.pdf) on wind energy impacts to wildlife. Recommendations, with some local context, include:

- Follow latest scientific guidelines to mitigate for wildlife losses. We urge you to use U.S. Fish and Wildlife Service and industry guidelines for cut-in speeds, lights, and curtailment of operation during peak migrations or other high use periods. Monitoring in Shenandoah National Park indicated that peaks for red bat and hoary bat migrations are mid-October and early November, respectively.
- Participate in regional efforts to determine cumulative wildlife impacts with other projects. It would be useful to learn if strike rates observed at Rocky Forge are similar to other wind energy installations (e.g., Mountaineer, Beech Ridge).
- Minimize impacts in site selection and during construction. As compared to migratory bats, turbine mortality is likely to be of less concern for threatened northern long-eared bats and endangered Indiana bats; however, there may be some negative impacts to these species associated with site clearing.
- Be transparent in monitoring and results sharing. Please consider allowing access for independent scientists to sample bird and bat mortalities following construction. We are aware that an environmental consultant found a maternity colony of threatened northern

long-eared bats on the project area, but to date, associated habitat data has not been released or shared with independent researchers or agencies.

We appreciate the opportunity to provide comments on this project. If additional information is desired, please feel free to contact me at (757) 592-6234 or aaprocto@gmail.com.

Sincerely,

Aaron Proctor
Past President
Virginia Chapter of The Wildlife Society

Cc. VA-TWS Executive Board, VA-TWS Conservation Review Committee