

The following is in response to application review comments received from the US Army Corps of Engineers concerning the Redington Wind Farm (RWF) application presently before LURC staff.

US Army Corps of Engineers

The project (Maine Mountain Power or MMP) has taken action to minimize impact to wetlands. At present, the direct impact is calculated to be 0.31 acres (Refer to page 102 of the Wetlands Impact in Section 7 of the preliminary LURC permit application).

Impact Avoidance Minimization: Corps comments to date indicate the Applicant has made a good faith effort to avoid/minimize wetland/waterway impacts. In response to Corps comments regarding opportunities for additional wetland impact avoidance / minimization measures, we note this has been a significant goal of the project from the onset and that a series of extensive field efforts have been made to investigate the locations and extent of wetlands along all road, transmission line, and turbine string routes as various alternate routes were investigated. Original project route designs, as described below, included approximately 20 acres of direct wetlands impacts. Current unavoidable wetland impacts have been reduced to 0.31 acres in a project comprised of approximately 307 acres of clearing. This reduction is the result of a significant series of project-related wetland avoidance and minimization efforts by the Applicant and project team members over the course of the 14 year project assessment.

A series of alternatives analyses which focused on wetland impacts and were conducted in conjunction with analysis of viewshed impacts and high value (i.e., rare) habitat, resulted in an alternative that best meets the project purpose and avoids wetland impacts as much as is practicable. The various alternative options have included both fundamental approaches to the mountain and a series of road layout redesigns to avoid/minimize filling and vegetation disturbances (e.g., movement of transmission line upgrade from Nash River floodplain wetlands and substation to avoid wetlands). For more detail, see our response to question 1 of the May 5, 2006 LURC questions and our discussion regarding wetlands avoidance below. Continued efforts to avoid or minimize any additional impacts to minor wetlands will be employed during the construction process as necessary. However, further substantive opportunities to undertake practical or feasible wetland impact avoidance/minimization efforts are not anticipated.

Airlifting turbine blades and towers to an assembly area is not viable due to the excessive weights of the turbine components. Consequently, there exists a need to utilize existing roadways. Additionally, design modifications to trailers used for off-road transportation of individual nacelle units have avoided the use of 'low-boy' (i.e., low ground clearance) trailers, thus eliminating the need for extensive road expansions and gentler grades within the project area. Any opportunities to pre-position equipment during the winter months using winter roads and frozen ground will be utilized to the greatest extent practicable. It should be noted that the turbine components will not even be manufactured until the early 2007 so pre-positioning opportunities will be very limited.

SEC 106 of the Historic Preservation Act. Attachment 5 of our responses to the March 29, 2006 LURC Questions is a letter from Earle Shettleworth, State Historic Preservation Officer, dated March 10, 2006, stating that there are "no historic properties [architectural or archaeological] adversely affected by the proposed undertaking".

Maine Indian Tribes. The RWF permit application has copies of letters dated June 7, 2005, sent to the Penobscot Nation, the Passamaquoddy Tribe, The Houston Band of Maliseet Indians and the Aroostook Band of Micmacs. Responses were received from the Penobscot Nation and the Passamaquoddy Tribe indicating that there are no known historical or archaeological sites within the project area. All correspondence with the tribes is attached as Correspondence with Native American Tribes.

SEC 7 of the Endangered Species Act

Woodlot Alternatives has been in contact with US Fish & Wildlife in the past. In 1994, they corresponded with Mike Bartlett in the Concord, New Hampshire, regional US Fish & Wildlife Office regarding the Redington Wind Farm project. Steven Pelletier has been discussing wildlife issues with Mark McCollough.

Wetland Impacts

Over the past 14 years, numerous project redesigns have reduced direct wetland impacts from approximately 20 acres to 0.31 acres. Field biologists investigated each of the proposed route options as they were developed. Investigations included wetland delineations, stream crossings, natural community and habitat assessments, and evaluations of other potential resources of concern, i.e., rare species).

Listed below are examples of these changes

- Road locations and power lines were changed many times to avoid wetlands. For example, the northern access road to Redington (RE6a on the map) was discarded in favor of a more western road (RE6b) to avoid wetlands and to minimize visual impact. The new route also eliminated construction of a bridge.
- The transmission line corridors were designed to avoid wetlands to the best extent possible.
- The Electric Harvest substation was moved to avoid wetlands.

National Park Service / Appalachian Trail

Correspondence with the National Park Service occurred in 2003 when Endless Energy Corporation requested a right-of-way for an access road across lands that are part of the National Park System, however, since then the applicant has redesigned the project so no such right-of-ways are needed. The letter from EEC to the National Park Service and the response letter are attached.

In 2006, NPS filed comments with LURC and recently stated that it will be a participating governmental commenter during the August 2006 LURC hearing.

Attachment 6 to our responses to the March 29, 2006 LURC questions is a copy of a presentation given to the US Navy on December 22, 2004 to discuss potential impacts. There has been no official correspondence between MMP and the Navy since that date.