

The following is in response to application review comments received from the Maine Natural Areas Program concerning the Redington Wind Farm (RWF) application presently before LURC staff. Response comments are presented on a point by point basis.

Maine Natural Areas Program

Response to Comments from the Maine Natural Areas Program regarding impacts to the S3 Fir-Heartleaf Birch-Subalpine Forest Exemplary Natural Community.

1. Disturbance and Impact Minimization. Inadvertent impacts to soils and vegetation should be avoided because alpine habitats are extremely slow to recover from soil and vegetation disturbances. This will best be accomplished by setting out strict no disturbance zones adjacent to the construction zones. These should be clearly marked.

Inadvertent impacts within the Fir-Heartleaf Birch-Subalpine Forest will be limited to the greatest extent possible. Clearing will be necessary for construction of turbine stations, access roads, and transmission lines. Forest clearings for turbines will be just large enough to contain the turbine foundation, crane pads and 3 crane assembly areas. This equates to less than 0.5 acres per turbine for a total of 13.1 acres of cleared forest. The crane pads and crane assembly areas will be re vegetated after construction. Additional vegetation clearing will be necessary for road and transmission line construction. Power lines along the ridgeline of both summits will be buried within the roadbed to further minimize fragmentation effects. Conservation of soil within the subalpine forest will be of high priority. MMP will set out clearly marked no disturbance zones adjacent to the construction zones.

2. Access Roads. As the site is part of a large unfragmented area of plant and animal habitat, wherever possible access roads and power lines should follow exiting routes to prevent additional fragmentation.

The project area contains an expansive network of existing haul roads and skidder trails. These existing roads will be utilized to the greatest extent possible.

3. Erosion Control. Erosion is a chronic problem on steeply sloped mountain roads. An erosion control plan addressing long term prevention of erosion on roads and cleared areas should be required.

A comprehensive Erosion Control Plan is included in our permit application and is in compliance with LURC Chapter 10.27D.

4. Off-site disposal. Construction debris and cleared vegetation should be disposed of off site.

Construction debris will be properly disposed off-site. Where possible, cleared vegetation will be chipped in place and the chips spread over exposed soil to prevent erosion and colonization by undesirable plant species.

5. Access Plan. A plan to prevent access to the site by unauthorized motor vehicles such as ATV's and four-wheel-drive trucks should be required. The irresponsible use of off-road vehicles in sensitive habitats such as high elevation terrain can lead to long lasting environmental damage. As part of the plan gates should be erected on access roads from the onset of the project and any temporary roads needed for construction should be reclaimed as soon as they are no longer needed.

Access roads into the project area will be gated to prevent unauthorized motor vehicle use, as discussed in our response 13 to March 29 LURC questions.

6. Invasive Plant Control. A plan to prevent the introduction of invasive plants to the site should be required. The plan should address preventing construction vehicles and heavy equipment from introducing invasive plants. It should include monitoring for the presence of invasive species over a period of three years after construction is finished.

Due to the harsh nature of the subalpine environment, opportunities for the colonization of exotic or invasive plant species is limited in the upper, high-elevation areas. In addition, opportunities for establishing non-indigenous species in upper elevation areas are greatly restricted by the aggressive regeneration of existing balsam fir. Extensive observations of existing cutover and disturbed areas clearly indicate balsam fir to be an efficient colonizer of exposed areas.

*Road enhancement may however support recruitment opportunities for exotic, albeit common, plant species along roadside edges, particularly at mid- and lower elevations. These species include timothy (*Phleum pratense*), quackgrass (*Elymus repens*), red clover (*Trifolium pratense*), cow vetch (*Vicia cracca*), and smooth bedstraw (*Galium mollugo*). These plants prefer dry, open, sterile soils that are typically indicative of roadside areas and can grow rapidly and densely under such conditions. Colonization by coltsfoot (*Tussilago farfara*) is particularly likely along access roads into the project site as it is widespread along many roads throughout the region. However, these plants remain restricted to open roadside areas and rarely encroach into forested communities.*

Invasive plant control measures within the entire project area, i.e., low, mid-, and high elevation habitats, will involve the use of wood chips generated during site clearing. Cleared vegetation will be chipped on-site and broadcast spread over exposed and disturbed soil to limit such colonization. There will be monitoring for the presence of invasive species for a period of three years after construction.

7. Restoration Plan. A restoration plan should be required that addresses how the site will be rehabilitated at the time the facility is decommissioned or if the project is

terminated before completion. The restoration plan should address all areas within the zone supporting the Fir-Heart-leaved Birch Sub-alpine Forest that have been cleared for any part of the project including roads, structures, power lines and storage areas. All materials brought into the subalpine zone should be removed as part of the restoration. Ideally a fund should be set up in advance to cover the cost of restoration.

In the event of facility decommissioning or project termination MMP has committed to remove equipment and allow the area to revegetate naturally. See the Letter of Intent in Attachment 3 to our responses to the March 29, 2006 LURC questions for more information about decommissioning.