



April 1, 2009

Maria Tur
New England Field Office U.S. Fish & Wildlife Service
70 Commercial Street, Suite 300
Concord, New Hampshire 03301

Dear Maria,

Thank you for taking time to meet with Ed Cherian and myself to discuss Iberdrola Renewables proposed Groton Wind Project. This letter serves to document the discussions which occurred at US Fish and Wildlife offices in Concord, NH on March 4, 2009 between Ed Cherian and Kristen Goland of Iberdrola Renewables and Maria Tur of US Fish and Wildlife Service and Mike Marchand and Carol Henderson of NH Fish and Game.

Iberdrola Renewables requested the meeting to formally re-introduce the agencies to the proposed Groton Wind Farm located in Grafton County New Hampshire. Official Agency comment letters had been sent to both agencies and Iberdrola received comments back in 2004 (NHF&G) and 2008 (USFWS). The proposed project was originally owned and proposed by WindWorks and a summary of the previous environmental studies completed by WindWorks was briefly discussed. Iberdrola then provided a summary of the current potential project including project boundary map and a summary of the planned avian and bat studies, which is in the attached *Proposed Work Plan for Avian and Bat Studies at the proposed Groton Wind Project* dated March 2, 2009 and was e-mailed to the agencies prior to the meeting.

Ed Cherian provided a summary of the project history and recent activities as well as the status of current timber operations on site by the primary landowners (Green Acre Woodlands/Marcal Paper and Wagner Forest Management).

While discussing the proposed study plan, Kristen Goland indicated the creation of the plan was guided by the Iberdrola Renewables Avian and Bat Protection Plan (ABPP), which USF&WS has endorsed, and the Groton Wind Farm Phase I Avian Risk Assessment (ARA) produced by Curry & Kerlinger. The ABPP had previously been circulated to the agencies but electronic copies of the Phase 1 ARA were distributed at the meeting.

Iberdrola discussed and solicited comments on the Proposed Work Plan for Avian and Bat Studies which included:

- Nocturnal Radar Migration Surveys;
- Diurnal Raptor Migration Surveys;
- Breeding Bird Surveys;
- Acoustic Monitoring for Bats;
- Additional Peregrine Falcon Surveys; and
- An Avian and Bat Risk Assessment.

Discussions:

- USFWS stated that the Concord Field Office has been recommending that 3 years of radar study are necessary to evaluate potential impacts to nocturnal migrants as well as the use of a weather station to measure cloud cover on site. Iberdrola Renewables understands that in the Interim USFWS Guidelines Memorandum, data be reviewed and evaluated by USFWS to determine if the risk is sufficiently high at each individual site. Iberdrola suggested that, in accordance with this recommendation, the first year of data be examined prior to discussions of multiple years of data collection. Iberdrola will provide copies of the Radar Studies for discussion once they are finalized.
- NHF&G suggested pre and post-construction breeding bird surveys. Iberdrola was unable to comment on the need for post-construction studies because pre-construction data had not yet been collected and analyzed to determine potential impact and risk. It was suggested that the possibility for post-construction studies be discussed collectively after risk assessment data was obtained.
- USFWS suggested Acoustic Monitoring for Bats include monitoring stations in the “peaks and valleys” on the ridge. Iberdrola discussed the practicality of the suggestion as well as the complications due to the placement of meteorological towers and suggested further discussions take place with Susi vonOettingen of USFWS within a few months when additional met towers will be installed at the project site.
- NHF&G suggested Iberdrola work with both Chris Martin of NH Audubon as well as NHF&G to review specific Peregrine Falcon surveys protocols to enhance the existing 2006 data. NHF&G noted the urgency of early coordination and discussion as a result of the early nesting season. Iberdrola indicated they hoped to initiate this contact soon.

In addition to specific recommendations in regards to the Avian and Bat Work Plan, other environmental studies were also discussed.

- Both USFWS and NHF&G recommended starting vernal pool surveys in early May. Iberdrola indicated they were currently soliciting engineering and wetland

bids and would request the consultant to initiate vernal pool surveys as soon as possible so as to not lose the 2009 year. NHF&G further suggested a fish survey of Groton Hollow Stream which would be examined during wetland surveys and delineations.

- NHF&G suggested additional studies including general habitat mapping which may result in a request for mammal tracking studies. Iberdrola suggested that as each environmental study is completed, qualified biologists will include a habitat assessment for areas surveyed, as applicable. Discussion will be planned with NHF&G on an ongoing basis.
- USFWS recommended project briefings with US Army Corps of Engineers and EPA. NHF&G recommended project briefings with NH Heritage Bureau. Iberdrola intends to initiate additional project discussions within the upcoming months.

We thank you for taking the time to meet with us and we look forward to sharing project data with agencies. 2009 studies will be underway shortly and we expect a busy year ahead with intensive data collection and assessment of the potential impact to birds and bats as a result of the proposed Groton Wind Project.

Should you have any questions please do not hesitate to contact me at 508-397-6130.

Sincerely,

Kristen Goland

Kristen Goland

Cc: Mike Marchand
Ed Cherian

Attachment

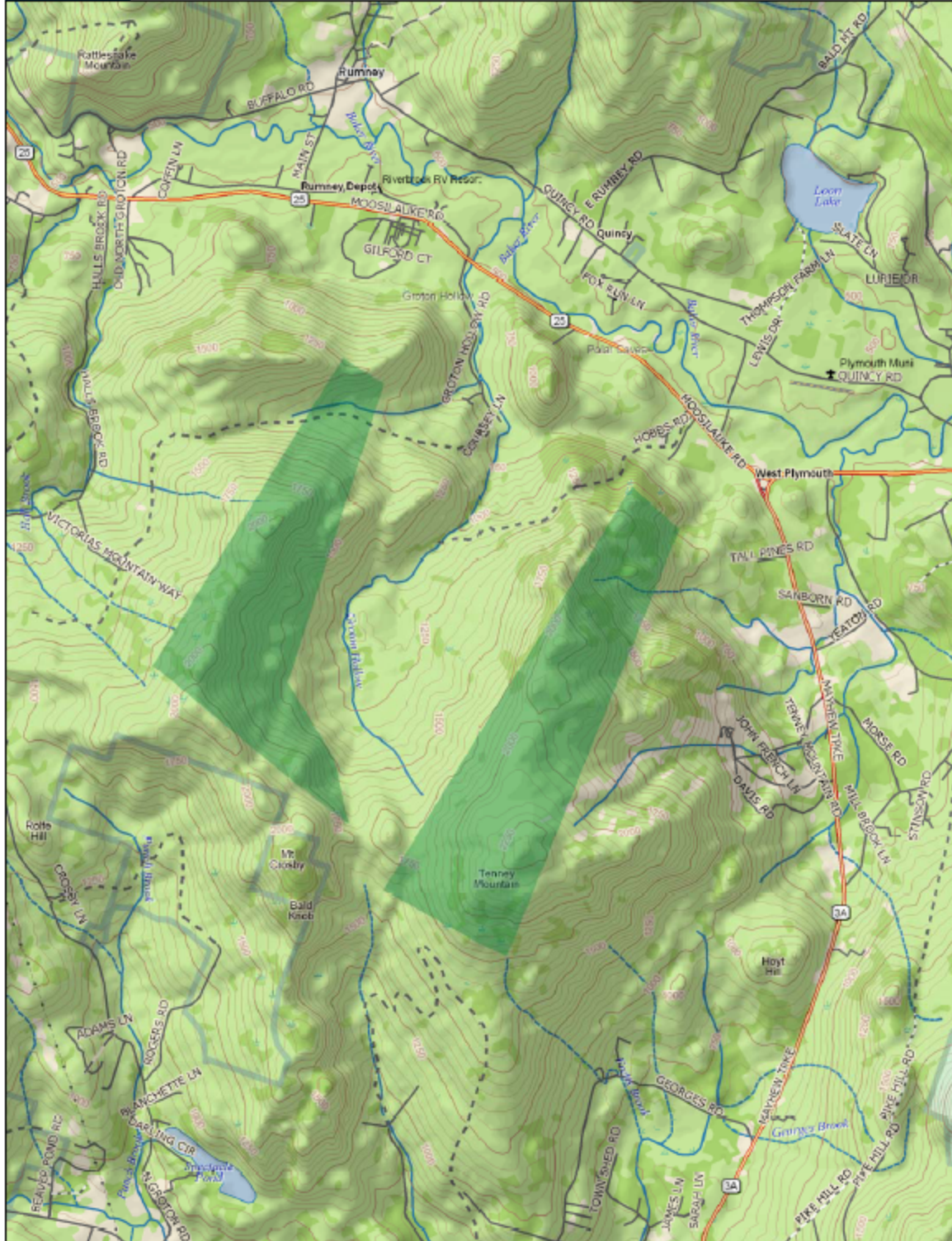
Proposed Work Plan for Avian and Bat Studies
at the proposed Groton Wind Project
Grafton County, New Hampshire

March 2, 2009

Proposed Project Background

Groton Wind, LLC, proposes to construct up to 20 wind turbines, each with an estimated nameplate capacity of 2.0 megawatts (MW), for a total project capacity of about 22 - 40 MW on Tenney and Fletcher Mountains in Grafton County, New Hampshire. The proposed project would consist of turbines, access roads, buried and aboveground interconnection lines, a substation with one or more transformers, an operation and maintenance facility and storage area, and one or two permanent meteorological towers. The wind turbines would have a hub height of about 78 meters (256 feet) above ground level (agl) and rotor diameters of about 87 m (286 feet). With the rotor tip in the 12 o'clock position, the wind turbines would reach a maximum height of about 120.5 m (398 feet). Turbines would be mounted on steel tubular towers and all or a subset of them would be lit according to Federal Aviation Administration (FAA) guidelines.

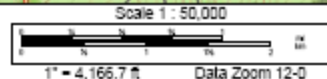
Early stage consultation with relevant agencies and NGOs is an important first step to identify appropriate pre-project environmental studies. Letter consultation has already occurred with United States Fish and Wildlife Service (USFWS) and New Hampshire Department of Fish and Game (NHF&G). Additionally, a live discussion with both USFWS and NHF&G has been requested. In concert with Iberdrola Renewables Avian and Bat Protection Plan (ABPP) initial discussions will take place at USFWS New England Field office on March 4, 2009. The following proposed study plan is the basis for those discussions.



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Study Objectives

The studies included in this work plan have been designed to determine the avian and bat use of the Project Area throughout the year with an emphasis on migratory and breeding periods. Overall, the main objectives are to:

- Determine whether suitable habitat for threatened or endangered species is found within the Project area;
- Collect baseline information on flight directions, passage rates, and flight altitudes of birds and bats recorded day or night throughout the migration seasons;
- Collect information on the occurrence and distribution of bird species including threatened or endangered species in the project area during migratory and breeding seasons; and
- Analyze baseline data and other available studies and data to evaluate potential impacts on birds and bats from the proposed Project.

Methodologies

Phase 1 Avian Risk Assessment (2008)

Curry & Kerlinger was retained to perform a Phase 1 Avian Risk Assessment which included a literature review, site visit, written agency consultation and habitat assessment. The purpose of the Phase I Avian Risk Assessment is to determine potential collision and displacement risk to birds from construction and operation of the proposed Groton Wind Project.

Radar studies (2008)

Stantec was retained to perform one full year of Nocturnal Radar Migration Surveys consisting of one spring (April 15 to May 31) and one fall (August 15 to October 15) migration season to yield a full year of nocturnal migration data. Both the spring and fall seasons have spanned a 45 night study period.

Diurnal Raptor Migration Surveys (2009)

Despite very low raptor mortality rates observed at existing wind projects, Groton Wind will contract with a third party to conduct spring and fall raptor migration surveys. Fall Migratory Raptor surveys will be conducted in the Project Area approximately once a week between August 15 and October 15, 2009. The selection of the sampling location will be dependent upon observation views afforded from the top of the ridges. All observations will be recorded on Hawk Migration Association of North America datasheets and methodologies will be based on HMANA methods. It is expected that spring surveys will repeat methodologies of the fall surveys but with a longer migration period ranging from April 15 – May 31, 2010.

Breeding Bird Surveys (2009)

Groton Wind intends to contract with a third party to complete one season of breeding bird surveys. Breeding bird surveys will be conducted twice in the Project Area during

the primary breeding season (June) of 2009. Surveys will use USGS Breeding Bird Survey techniques with an observer recording all birds identified by sight or sound in 5-minute periods at each survey point. Birds observed flying through the area will also be documented and noted separately on the datasheets because they are less likely to be breeding or associated with the surrounding habitat but tend to live in the general area. An estimated flight altitude will be collected for those flying through the project area. All surveys will be conducted between sunrise and 10:30am during two consecutive days. The data from these surveys will also help identify the presence/absence of listed species on the site.

Acoustic Monitoring for Bats (2009, 2010)

Acoustical monitoring via anabat will be conducted for the spring and fall migratory periods as well as the summer activity period, typically April 15 through October 31. Groton Wind will consult with bat experts to deploy acoustic monitoring equipment on meteorological equipment at on the Project site. Two or three detectors sampling a horizontal plane will be installed on a single meteorological tower. The first will be installed as high on the tower as possible approximately 50 meters above the ground. The other one or two units will be installed between that unit and the ground. Acoustic detectors will document the presence/absence of bat species in the Project Area. Call rates by species, as well as total detections and trends in species' presence in the data set will be reported. Additionally the call rates and species composition of the detectors will be compared.

Peregrine Falcon Survey (2006, 2009)

Stantec performed 4 Peregrine Falcon Surveys from Rattlesnake Mountain in Rumney, New Hampshire during the summer and early fall of 2006. Although activity was documented, the nest failed for the first time in 2006 and no fledglings were observed however adult behavior was documented and area was delineated. Although no adults were seen flying or using the airspace within the project area, Iberdrola anticipates repeating the survey in 2009.

Avian and Bat Risk Assessment (2010)

At the conclusion of all studies, a final Avian and Bat Risk Assessment will be prepared and presented as part of the Site Evaluation Committee Application. It is anticipated that these study results will be discussed with USFWS and NHF&G upon completion. Additionally, these studies will inform a project-specific Avian and Bat Protection Plan (ABPP) which incorporates the company wide best practices ABPP endorsed by the USFWS in October 2008.

From: Michael N Marchand [Michael.Marchand@wildlife.nh.gov]
Sent: Monday, April 20, 2009 10:24 AM
To: Goland, Kristen
Subject: RE: Iberdrola Renewables - Groton project meeting follow-up
Hi Kristen.

In addition to attached, a few other species of interest come to mind.

- 1) Brook trout potential - Groton Hollow brook
- 2) Wood turtles - 'potential' in Groton Hollow brook, depending on gradient and level of floodplain. We know they occur in the Baker River. Current status in NH is SC.
- 3) Deer wintering areas - see note from regional biologist below....(this might go along with the coarse scale habitat assessment I requested)

The deer yard maps we have for the project area are outdated (1987), so I looked at the WAP deer yard model for the proposed area. The model shows lowland spruce/fir cover that has the potential for deer wintering cover. Field work could confirm deer winter use of the areas. We check yards in the winter to determine current activity, but yards can be mapped anytime of year based upon past sign.

Karen

Karen Bordeau
NH Fish and Game, Region 2
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New Hampton, NH 03256
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Fax: 603-744-6302

From: Goland, Kristen [mailto:Kristen.Goland@iberdrolausa.com]
Sent: Wednesday, April 01, 2009 1:45 PM
To: Michael N Marchand
Cc: Carol Foss; Cherian, Ed
Subject: Iberdrola Renewables - Groton project meeting follow-up

Hi Mike,
Thank you for taking the time to review and discuss our Proposed Study Protocol for the Groton wind project. The attached letter is a summary of the meeting and our follow-up based on the discussions. A hard copy will follow in the mail. I anticipate calling Chris Martin in the next few days to schedule a PF discussion.

Thanks again,
Kristen



Kristen Goland
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Technical Services
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508.397.6130



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