

June 9, 2020
Jessica Damon
Maine Department of Environmental Protection
106 Hogan road
Bangor, ME
04401

Michael Carey
Development Manager

SWEB Development USA, LLC
209 West Central Street, Suite 306
Natick, MA, USA
01760
(902) 222-3959

Michael.Carey@swebdevelopment.ca

Re: Radar Requirement for the Silver Maple Wind Project

Dear Jessica Damon,

We would like to sincerely thank you for your diligence and promptness on your review of the Silver Maple Wind Project. Working with the Department of Environmental Protection has been a tough but fair thus far, and we appreciate the approach your team has taken in evaluating our project. We remain concerned however with respect to the Department's current recommendation of the deployment of a radar system as part of our aviation lighting design.

Firstly, while the project area is located near to a number of scenic resources, it is clear from our photo renderings that the actual nacelles (and therefore the aviation lights) will not be visible from a more than a small handful of vantage points. These vantage points are most likely to be enjoyed during the daytime in the summer. When time of day is considered and hourly usage is considered, relatively few residents and tourists are likely to be using those specific vantage points during nighttime hours. This frequency is further decreased when the late nightfalls of the summertime are considered (as late as 8:49 pm), which is when users would less likely to be on or near such lakefront vantage points.

Relatedly, the presence of the Pisgah Mountain project presents a precedent for the successful operation of a wind project without radar-based lighting at that location. While the Silver Maple towers will be taller than those at Pisgah Mountain, we understand that no complaints have been made of the existence of the current lighting system on the existing five turbine project.. Local residents and visitors have continued to enjoy the surrounding scenic resources, and the area has not seen a decrease in tourism or enjoyment based on the existing project.

Lastly, in light of the Department's request, which we take seriously, we have explored our options around lighting. We found that the costs of radar lighting are cost prohibitive to a project of the size of Silver Maple. As you may or may not be aware, the fixed costs of such a radar system are uniform, regardless of the number of turbines, thus creating a higher cost barrier on a per megawatt basis for the five turbine (20 MW) Silver Maple Wind Project. While we understand that the types of larger projects recently approved by the Department could reasonably absorb such a cost, the costs create significant challenges for Silver Maple.

We therefore request the opportunity to revisit this issue with the Department in light of the above. Again, we thank you for your diligence and responsiveness during this process. We look forward to completing this permitting process, and realizing a project that is a success for all parties and stakeholders involved.

Sincerely,



Michael Carey
Development Manager
SWEB Development USA, LLC