



Power Siting Board

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September 23, 2020

To Whom It May Concern:

On October 1, 2013, in case number 13-0197-EL-BGN, Northwest Ohio Wind, LLC (Applicant) filed a supplement to the amended application which contained Applicant's commitments pertaining to the project. This supplement was adopted into the certificate approved in case number 13-0197-EL-BGN on December 16, 2013 and as modified by associated subsequent modifications. Commitment 13 states the following:

Sixty days prior to the first turbine becoming commercially operational, Applicant will submit a post-construction avian and bat monitoring plan for DOW and OPSB Staff review and acceptance. Applicant will also provide the monitoring plan to and seek confirmation from the USFWS. Applicant's plan will be consistent with ODNR-approved, standardized protocol, as outlined in ODNR's On-Shore Bird and Bat Pre- and Post-Construction Monitoring Protocol for Commercial Wind Energy Facilities in Ohio. Applicant will obtain the necessary permits from ODNR and USFWS to collect bat and migratory bird carcasses. The post-construction monitoring will begin within two weeks of operation and be conducted for a minimum of two seasons (April 1 to November 15), which may be split between calendar years. If monitoring is initiated after April 1 and before November 15, then portions of the first season of monitoring will extend into the second calendar year (e.g., start monitoring on July 1, 2011 and continue to November 15, 2011; resume monitoring April 1, 2012 and continue to June 30, 2012). Applicant may request that the second monitoring season be waived at the discretion of ODNR and OPSB Staff. The monitoring start date and reporting deadlines will be provided in the DOW approval letter and the OPSB concurrence letter. If it is determined that significant mortality, as defined in ODNR's approved, standardized protocols, has occurred to birds and/or bats, Applicant understands that the DOW and OPSB Staff will require Applicant to develop a mitigation plan. If required, Applicant will submit a mitigation plan to the DOW and OPSB Staff for review and approval within 30 days from the date reflected on ODNR letterhead, in coordination with OPSB Staff, in which the DOW is requiring Applicant to mitigate for significant mortality to birds and/or bats. Mitigation initiation timeframes will be outlined in the DOW approval letter and the OPSB concurrence letter.

A significant mortality event was detected at Northwest Ohio Wind Project on September 4, 2019. The ODNR Protocol defines a significant mortality event as the detection of greater than five bird/bat fatalities during a survey at a single turbine, and/or detection of greater than 20 bird/ bat fatalities across the entire facility during a single day of post-construction monitoring. On September 4, 2019, seven bat fatalities were recorded at turbine T04. On August 28, 2020, Applicant submitted to Staff a mitigation proposal prepared by Westwood Professional Services containing two options, Option A and Option B.

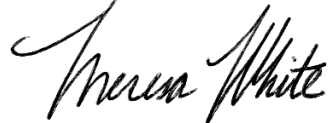
Option A consists of the continuation of avian mortality monitoring similar to previous monitoring, with increased attention to western and eastern portion of the project and with different curtailment

regime. However, the certificate incorporated a condition (condition 17) which required the Applicant to obtain a technical assistance letter from USFWS which required a specified curtailment regime. Option A included curtailment options which would not meet the requirements of the USFWS technical assistance letter and therefore would not be in compliance with the terms of the certificate.

Option B focuses on identifying when the fall bat migration has started through daily fatality monitoring to determine whether a more tailored response can reduce nightly fatalities with focus on turbines where bat deaths have been greatest. Upon first observation of an increase in the daily number of bat carcasses, the project will increase full-feathering below cut-in speeds of 7.5 m/s for the monitored turbines; increased monitoring under this feathering criteria will continue until monitoring has identified the effective end of the bat migration wherein the cut-in speeds will be reverted to 6.9 meters/second until October 30, 2020. ODNR has reviewed and approved this mitigation proposal.

Staff has determined that Option B would an acceptable mitigation strategy in compliance with the terms of the certificate. The Northwest Ohio Wind Project began implementation of the mitigation strategy (Option B) on September 5th, 2020. Staff concurs with ODNR's approval of this plan.

Sincerely,

A handwritten signature in black ink that reads "Theresa White". The signature is fluid and cursive, with the first name "Theresa" and last name "White" clearly distinguishable.

Theresa White
Executive Director
Ohio Power Siting Board

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Case No(s). 13-0197-EL-BGN

Summary: Correspondence Concurrence With ODNR Approval of Mitigation Plan
electronically filed by Mr. Grant T Zeto on behalf of Staff of the Ohio Power Siting Board