



ROCKBRIDGE AREA CONSERVATION COUNCIL

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June 6, 2016

Rocky Forge Wind, LLC
C/o Apex Clean Energy, Inc./ Charlie Johnson
310 4th St, NE, Suite 200
Charlottesville Va. 22902

Re; Rocky Forge Wind Energy Project

Dear Mr. Johnson,

I am writing on behalf of the Directors and membership of the Rockbridge Area Conservation Council (RACC) to express our concerns about the Rocky Forge Wind Energy project. Please accept and include these comments, with attachments, as part of the official record, during the current, DEQ mandated public comment period which closes 6/6/2016

Since 1976, RACC's mission has been to promote the wise stewardship and sustainable use of natural and cultural resources to enhance the quality of life for present and future inhabitants of Rockbridge County.

RACC believes that approval and development of this project is an unwise proposal of historic proportion. We contend that the modest, unproven, marginally available wind resource, above Sandbank (also North) Mountain does not justify the Project's many predictable and identifiable, on and offsite environmental impacts to be suffered on are residents and natural populations.

There are a number of reasons that Sandbank Mountain is a particularly bad location for strip developing an industrial wind turbine power facility. Besides the tracked Eastern Golden eagles and the bats in the area, the project would broadly impact an ecological core area that the Nature Conservancy, the Outdoor Space Institute and Virginia Natural Heritage have all identified as of very high natural conservation value. This planned wind turbine project would be along 3.5 miles of a defining ridgeline within this natural resource district shared by Rockbridge County and other jurisdictions. See attached "Arcadia" Narrative and map.

This industrial development is proposed in a location impacting migration where the Alleghany Front and the Blue Ridge are closest, and where the James flows through. This natural migratory bridge will be more important as time goes on, the climate changes, and nearby areas bordering the region are developed.


If permitted by the Commonwealth of Virginia, the Rocky Forge project would be the first industrial scale wind power facility approved and constructed in Virginia, a precedent setting and public policy testing of industrial wind development along the popularly treasured forested mountain ridges of western Virginia.

It seems to us that a key argument against approval of the RF Project-PBR is the ironic wastefulness of using public subsidies to facilitate elevated environmental cost/benefit ratios when developing wind power in sub-optimal wind conditions at treasured and vital green-field forested mountain ridge locations like Rocky Forge.

As citizens of Rockbridge and Virginia, RACC seeks accountability on this project's human health and environmental impacts, as well as honesty on its productivity and CO2 reduction. We respectfully request that prior to DEQ approval, the developers of a project of this scale, with its potential to so profoundly alter the natural landscape, provide irrefutable evidence that the energy generated is worth the significant environmental, human, and economic tradeoffs imposed on our locality.

RACC also observes that the Permit-by-Rule process, as implemented by this applicant, failed to provide the complete application material before the start of the review period, and failed to respond to the specific reasons cited in the several requests for adequate review time – even those from local government. Public meetings that provide information to public decision making bodies need to be held by and conducted by that body,

Sincerely,

A handwritten signature in black ink that reads "Lee Merrill". The signature is written in a cursive style with a large, stylized "L" and "M".

Lee Merrill, Co-President

Attachments: Arcadia Narrative and Map

Environmental Conservation Information on the Arcadia Initiative

The southern end of Rockbridge County and the northern part of Botetourt County, or “Arcadia,” is where the ridge systems of the Allegheny Highlands and the Blue Ridge Mountains come closest together and the James River cuts through into the Piedmont. This area is the quite possibly the last, least developed, heavily forested Virginia landscape providing a functioning connection for wildlife migration between the Allegheny and Blue Ridge Mountains. The Rockbridge Area Conservation Council (RACC) has been working on developing a landscape scale conservation plan for this area since 2012.

The rapidly urbanizing I-81 corridor hinders movement and connection of plants and animals across the valley, and is already dissecting and adversely impacting the natural habitat and ecosystems, with the potential to diminish regional species’ viability, genetic health, and biodiversity. In contrast, the Arcadia area currently has relatively little human development, is heavily forested, and already has significant amounts of land under conservation easements or federal and state public ownership.

Recent studies by both the Nature Conservancy and the Open Space Institute have identified this area as one of the most intact and ecologically resilient forested landscapes within the Appalachian Mountain region. The Virginia Natural Heritage Program has identified much of this area as having a high or outstanding conservation values hosting an impressive diversity of flora and fauna. Virginia Natural Heritage rates several plant and animal species found in this area as “extremely rare and critically imperiled” or “very rare and imperiled in Virginia.”

RACC, the Valley Conservation Council, and the Virginia Outdoors Foundation, have already worked together to establish the V.O.F. Buffalo Creek - Purgatory Mountain Special Project Area which facilitates creation of conservation easements in this area. It “includes one of the few remaining intact rural east-west connections between the Alleghany and Blue Ridge Mountains. This undeveloped corridor provides critical habitat connectivity and safe passage for wildlife between the ridge systems.” And also contains “numerous cultural resources.”

The Buffalo Creek Wildlife Corridor is an ongoing RACC project with Virginia’s Department of Transportation facilitating safer wildlife migration across the valley, above and/or underneath Interstate 81.

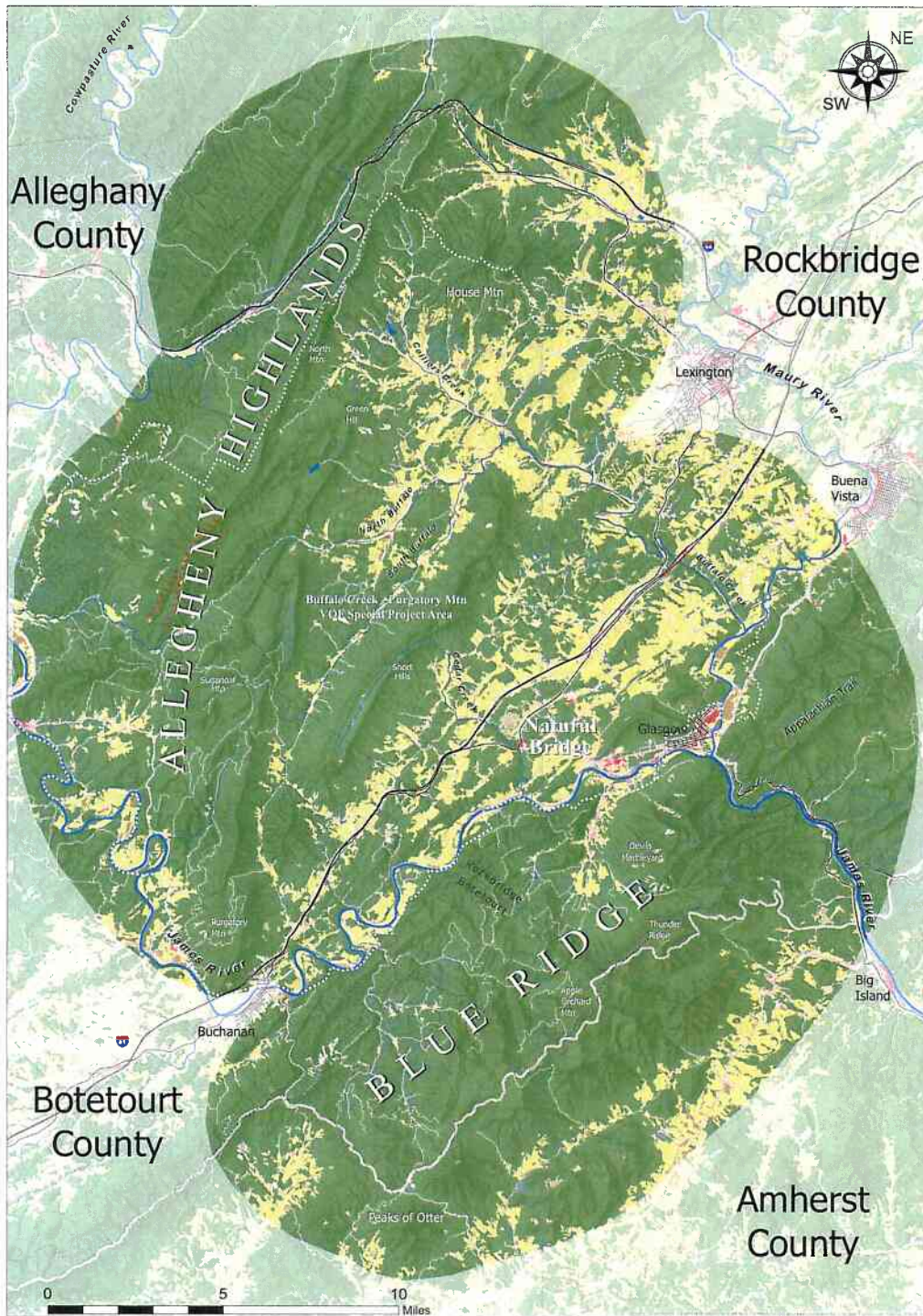
The area’s unique geological features include the Natural Bridge of Virginia and nearby caverns, the James River Watergap through the Blue Ridge at Balcony Falls, the canoe-shaped mountain ridgeline of Short Hills, and the Antietam quartzite pillars of the Devil’s Marbleyard.

Many existing recreational opportunities are found within the region, including fishing and boating on the James and Maury Rivers, hiking on the Appalachian Trail, hunting in the Short Hills Wildlife Management Area, and biking on Bike Route 76 and other nearby roads. There are three wilderness areas nearby—James River Face, Thunder Ridge and Rich Hole These wilderness areas are within the George Washington/Jefferson National Forest, which also has

many other trail systems, including the Apple Orchard Falls Trail and others for horses and ATVs, and miles of mountain biking terrain.

In the National Forest, there is camping at the Cave Mountain Lake Recreational Area (which also has a lake for swimming) and at Hopper Creek Campground, in addition to nearby private campgrounds. The yet- undeveloped Moore’s Creek State Forest is also nearby. The Blue Ridge Parkway National Park traverses the crest of the Blue Ridge, with food and lodging at the Peaks of Otter Lodge, at milepost 86 on the Parkway. The radar dome at Apple Orchard Mountain and Apple Orchard Falls are also close to the Parkway in this area. Botetourt County’s Upper James River Water Trail is being planned to extend downriver to Balcony Falls in Rockbridge Co.

Mapping, data gathering, and expansion of the coalition of partners working together to conserve this area is ongoing. These partnerships can and will encourage investments through water quality improvement programs, promotion of agricultural BMP’s, purchase of development rights, reforestation and riparian improvement projects, conservation easement tax credits, alternative agricultural enterprises, mitigation/forest sequestration credits, creating new agricultural/forestall districts, and increased outdoor recreation and nature-based tourism activities. This wildlife and land conservation district is also being defined as a goal worthy of special attention within the current revisions to the Rockbridge County’s Comprehensive Plan’s Land Use Chapter.



where the James flows through
the heart of Virginia's mountains