



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.

At the May 25th APEX/ public meeting at Eagle Rock Library, we were informed by Apex's "Pirate Bush" expert that a Piratebush survey (per Rocky Forge PBR attachment(7(C)1 Map2) had recently been made, but not yet submitted to DEQ for inclusion in the PBR *final* application materials. To afford RACC and all Interested citizens an opportunity to comment on the complete and final PBR application, RACC requests DEQ/Apex provide all the additional or Final application materials, along with all the submitted Public comments received by Apex and submitted to VA DEQ under the RF-PBR protocols. RACC further requests that DEQ require Apex to provide a final opportunity of 30 days to respond to those provided final materials with public comments.

Attachment 7C(1) of the Rocky Forge Wind PBR Application primarily contains only the VA DCR Division of Natural Heritage Program (VNHP) information on the natural heritage resources of the "project footprint" using the Rapid Assessment Field Survey for Ecological Community Groups. This assessment assigned the project footprint site a biodiversity ranking of B4 on the rarity, quality and number of element occurrences. That information indicates the "project footprint" significantly impacting a conservation site of particular ecological importance.

The entire RF Project Disturbance Area, Project Area and Buffer Zone are in an area with an Ecological Integrity Score of C1 – Outstanding. The adjacent core areas of Purgatory Mountain over to the Blue Ridge are also rated as Very High, High or Outstanding,

thereby providing the last functioning wildlife corridor across the I-81 urbanizing corridor (see VaNLA Map attached).

The DCR VNHP also utilizes the Virginia Natural Landscape Assessment (VaNLA), an analysis for identifying, prioritizing and linking natural lands in Virginia. According to the DCR VHNP, over 50 attributes are assigned to the ecological cores providing information about rare species and habitats, environmental diversity, species diversity, patch characteristics, and water quality benefits. The VaNLA assigns each core and habitat fragment an Ecological Integrity Score that rates the relative contribution of the area to the ecosystems values. Higher scores are given to larger more biologically diverse areas, areas that are part of a larger complex of natural lands, and cores that contribute to water quality enhancement.

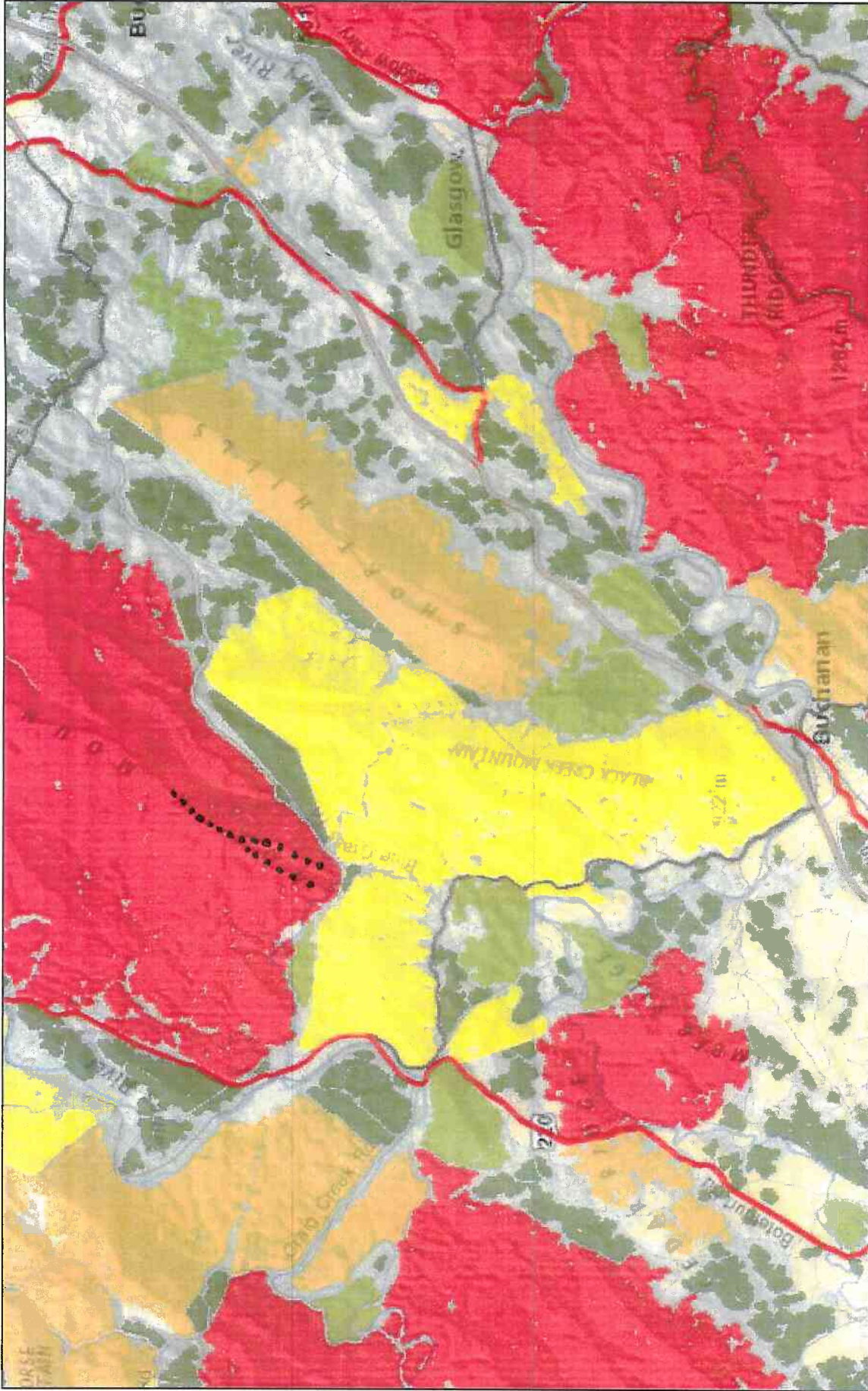
Attachment 7C (1) of the Rocky Forge Wind-PBR application does not fully address the DCR-VHNP's Ecological Integrity Score of C1. Without a careful regional assessment of the natural ecology impacts created by this proposed Project's development (along with the several others industrial wind turbine projects developing along western Virginia's forested mountain ridgelines), RACC contends that no offered mitigation plan or post construction monitoring for this Project may sufficiently or adequately offset the negative natural ecological impacts, either short term or long term, to the citizens, residents, or natural populations of Virginia and the upper James River watershed.

Sincerely,

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

Lee Merrill, Co-President

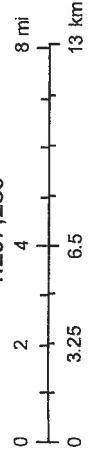
Map



May 31, 2016

- C1: Outstanding
- C2: Very High
- C3: High
- C4: Moderate
- C5: General
- US Primary Highways
- VA Primary Highways
- Ramps
- Limited Access Highways
- All Other Roads
- Additional NAVTEQ Info
- TURBINE LOCATION**

1:237,285



Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, DeLorme, HERE, UNEP-WCMC, USGS, NASA,