

**UPC Vermont Wind LLC – Sheffield Wind Farm**  
**Proposed Avian/Bat Mitigation Plan**

If post-construction monitoring demonstrates that the Project is having an undue adverse impact on birds or bats, as determined in consultation with ANR, UPC will work with ANR to identify and implement appropriate and practical mitigation measures. Measures to be considered will take into account the available research information regarding the likely cause(s) of the impacts, as well as the likely costs/benefits of various mitigation alternatives. Examples of possible mitigation measures may include, but are not limited to:

Modified Lighting. Studies have shown that, in general, lighted structures pose a higher risk for bird collision impacts than unlighted structures (although this has not been shown to be the case with wind turbines, which have modest lighting in comparison to the structures studied). In the event that undue adverse impacts occur as a result of bird or bat collisions with lighted turbines, UPC will consider alternative scenarios for lighting, such as reducing the number of turbines with lights or altering the arrangement of lights. For example, if one or more turbines that have lighting are suspected to be causing the impacts, UPC will request permission from the Federal Aviation Administration (FAA) to remove or change lights from the subject turbines. The final determination of lighting, however, rests with the FAA.

Modified Operations. If one or more turbines are found to be causing an undue adverse impact on birds or bats, UPC will consider (but cannot commit to) modifying their operation, provided: (a) there is a good basis for expecting that modified operation will pose significantly less risk than normal operation, and (b) there is no material impact on the performance (output) of the project. The latter is essential, because allowing for a material change to the performance of the project would represent a significant risk to the project's investors, and could jeopardize project financing. An example might be to not allow non-generating turbines to free-wheel at night during fall migration.

Installation of Repellant Devices. Tests are being conducted on the effectiveness of ultrasonic acoustical deterrents for bats at wind farms in West Virginia and Pennsylvania. If one or more turbines are found to be causing an undue adverse impact on bats, UPC will consider installing similar devices provided they have been adequately tested and shown to be effective, and do not result in other adverse impacts (such as disturbance of residences, pets, or other wildlife).

On-Site Habitat Management. UPC will also consider habitat management measures in the vicinity of the turbines to modify wildlife behavior and reduce the risk of impacts. Any such measures would be determined in consultation with ANR in response to specific concerns or impacts that are related to habitat factors. Examples include, but are not limited to, modifying the type or extent of vegetation cover, forest openings, perching and nesting sites, or cover for prey species.

Habitat Protection. If measures to avoid or minimize impacts are not practicable, UPC will consider compensatory mitigation measures such as protection or enhancement of nearby wildlife habitat. Any such measures would be identified and implemented in consultation with ANR.