



Rochester Birding Association

**P.O. Box 92055, 1335 Jefferson Road
Rochester, NY 14692-9998**

Re: Case No. 16-F-0546: Heritage Wind, LLC

Comments on Stipulations and Revised Scoping Statement

1. The Rochester Birding Association remains concerned that migrating shorebirds, waterfowl, warblers, thrushes and rarer species of greater conservation need have not been adequately assessed as part of the bird studies. The only migratory studies completed by Heritage Wind were for raptor species.. Many songbirds and shorebirds migrate at night and would not be noted during raptor surveys.
2. Three turbines (T 1 – 3) will be 2.6 miles from Iroquois National Wildlife Management Area and along with turbines T 4 – 6; all six are 0.75 miles from the northern boundary of Oak Orchard State Wildlife Management Area. These make a cluster with tip of blades at 655 feet and 489 feet rotor diameter (for the N149). Blades moving at 210 mph are going to be a challenge for birds trying to land in these two wildlife management areas.
3. We are concerned that the current survey areas for mortality studies do not reflect the taller turbine heights or longer blade lengths. While the distance between turbines is based on a formula (so wind generated is not impacted by other turbines), we see no indication that a formula is used to estimate areas to test for mortality. Simply those used are standard distances from older studies.
4. We have concern about the height of turbines continuing to get taller in each draft of the scoping document. The world's tallest turbines are now over twice the height of the ones for which most bird study parameters were set. If you were to decide to go larger than the N149, then the impact studies on bird species should be redone and/or added.
5. Lastly we have repeatedly requested contact with our organization go through our Conservation Chair, Amy Kahn. The address of record should be either the one on this letter head or our official address which is Rochester Birding Association, P.O. Box 92055, 1335 Jefferson Rd. Rochester, NY 14692-9998.