Secretary Kathleen H. Burgess New York State Board on Electric Generation Siting and the Environment Three Empire State Plaza Albany, New York 12223-1350

Taylor Quarles Apex Clean Energy 8687 Main Street Barker, NY 14012

Submitted electronically to: info@lighthousewind.com & Hon. Kathleen H Burgess secretary@dps.ny.gov

May 9, 2018

RE: Case Number: 14-F-0485, Lighthouse Wind

Dear Secretary Burgess and Mr. Quarles;

The Rochester Birding Association (RBA) has reviewed the Stipulations, specifically Stipulation 22, for Case Number: 14-F-0485 Lighthouse Wind.

We restate our objections to the limited studies done to determine impacts on birds. In the application discussion, more emphasis should be placed on data from the many long term or ongoing studies that have been done along the south shore of Lake Ontario rather than on Apex's brief point in time studies. The majority of this project is within two miles of the Lake Ontario shoreline which is entirely within the internationally important migratory pathway of hundreds of bird species. There are studies which have documented the importance of this migration pathway for 70 years. These projects should carry more weight than the brief point in time studies done by APEX, the results of which have yet to be released for peer review. A quick review of ebird and some of the long term studies by TNC, BBBO, and HMNA, yields 280 species in the Somerset Yates area including 19 species shorebirds, 159 songbird species, 27 raptor/owl species, 42 species waterfowl, and 12 gull/ tern/jaeger species.

In addition, as part of either Stipulation 6 or 22, in APEX's application they need to detail the mechanical means they plan to use to minimize harm to birds (AWEA Gulf Wind Radar-RSB 2-24-2012). The application needs to specify the automated detection method that will stop turbines if large numbers of birds are detected by radar.

Sincerely,

Amy Kahn

Amy Kahn President **Rochester Birding Association**