

## Attachment 13B

### Rocky Forge Wind Public Comment Report

#### REQUIREMENT:

*9 VAC 15-40-30.A.13: Prior to authorization of the project and in accordance with § 10.1-1197.6 B 13 and 14 of the Code of Virginia, conducts a 30-day public review and comment period and holds a public meeting pursuant to 9 VAC 15-40-90 . The public meeting shall be held in the locality or, if the project is located in more than one locality, in a place proximate to the location of the proposed project. Following the public meeting and public comment period, the applicant shall prepare a report summarizing the issues raised by the public and include any written comments received and the applicant's response to those comments. The report shall be provided to the department as part of this application.*

In accordance with 9 VAC 15-40-30.A.13, Rocky Forge Wind conducted an extensive public comment and review process. The public review and comment period ran from July 9, 2020 through August 10, 2020. Rocky Forge Wind made the modification application documents available for public review during this period through an online platform at [www.rockyforgewind.com](http://www.rockyforgewind.com). The website provided the public with an easily accessible digital version of the application and supporting documents for review. The site also allowed the public to submit comments and questions. Rocky Forge Wind also provided a physical copy of the documents for public review at the Botetourt County Circuit Court Clerk's office at 1 W Main St., Fincastle, VA 24090. Because Virginia's State of Emergency Order (Executive Order 51) was still in effect, a physical public meeting was not possible. Instead, Rocky Forge Wind held a telephonic public meeting on July 28, 2020 from 5:00 PM to 7:00 PM. 25 individuals participated in the telephonic public meeting and 11 individuals chose to comment/ask questions during the meeting.

Through the public comment process, interested individuals had an opportunity to ask Rocky Forge Wind representatives questions via the website, email or telephone and to provide oral comments or written comments online and by letter or email. Notice of the public review and comment period and the public meeting was published in the Fincastle Herald and the Lexington News-Gazette on June 24, 2020, and July 1, 2020. **Attachment 13A** includes a copy of these notices.

72 members of the public provided comments on the Rocky Forge Wind modification application. 51 of the commenters supported the modifications. 21 of the commenters expressed concerns and were not supportive of the modifications, although some of these commenters were not supportive of the Project as a whole and did not provide comments on the modifications.

The following spreadsheet summarizes comments and includes responses organized by general topic. Where one letter included comments on multiple topics, those comments are set out by topic instead of by individual letter. Exhibit 1 to this Public Comment Report consists of all of the public comments received.

Row ID	Commenter	Summary of Comment	Apex Response
1	Kathleen Ball	See link	Rocky Forge Wind has taken the appropriate measures as required by local, state, and federal authorities to show that this project will not harm surrounding communities. First, Rocky Forge has and will continue to follow required local, state, and federal requirements for keeping residents informed. Second, Rocky Forge has and will continue to assess what, if any, impacts the project may have on avian species and follow local, state, and federal laws regarding these resources. Third, viewshed has been taken into account in the visual impact study provided in the application. FAA lighting atop the turbine nacelles is intended to be visible to aircraft, thus they are not expected to be a significant cause of light pollution to the region. Rocky Forge must follow FAA regulations on the matter. Fourth, renewable energy sources, including wind, are hugely beneficial to the environment, not costly to it. Rocky Forge encourages all residents to review our website's "Resources" page, which provides facts on wind energy: <a href="https://www.rockyforgewind.com/resources">https://www.rockyforgewind.com/resources</a> .
2	Steven Banks	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Steven Banks 2001 Hardwick St Blacksburg, VA 24060</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
3	Jana Bean	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Jana Bean 1130 Persinger Rd SW Roanoke, VA 24015</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
4	Mary Bishop	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Mary Bishop 2311 Kipling St SW Roanoke, VA 24018</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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5	Michael Brown	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Michael Brown 63 Rose Dr Eagle Rock, VA 24085</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
6	Diana Christopulos	<p>Dear Mr. Johnson,</p> <p>It is time for onshore wind in Virginia. This project has the full support of local outdoors and environmental organizations, has no impact on major trails and viewsheds, and requires virtually no new transmission lines, which are the most destructive aspect of wind energy. I urge you to provide the final permit for this project.</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Diana Christopulos 907 Greenbrier Ct Salem, VA 24153</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
7	Jon Cooper	<p>Dear Mr. Johnson,</p> <p>I fully support the development of renewable wind energy in Botetourt County, Virginia. Rocky Forge Wind will be the first onshore wind farm in our beautiful state, powering up to 21,000 homes. The state will now become more of a producer of green energy instead of just a consumer.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add up to \$25 million in state and county tax revenue.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Jon Cooper 535 Hollymeade Ln Daleville, VA 24083</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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8	Dan Crawford	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Dan Crawford 2311 Kipling St SW Roanoke, VA 24018</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
9	James Crumley	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, JAMES CRUMLEY 2917 Trebark Rd Buchanan, VA 24066</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
10	David Denham	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, David Denham 3512 Wright Rd SW Roanoke, VA 24015</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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11	Jim Dodd	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Jim Dodd 1403 Greyledge Rd Buchanan, VA 24066</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
12	Deborah Freeman	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Deborah Freeman 5109 Falcon Ridge Rd Cave Spring, VA 24018</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
13	Mark Hanson	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Mark Hanson 184 Vista Ln Fincastle, VA 24090</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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14	Bryan Jones	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Bryan Jones 2282 Flowing Spring Rd Buchanan, VA 24066</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
15	Leonard Kolstad	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Leonard Kolstad 2505 Longview Ave SW Roanoke, VA 24014</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
16	Edgar Kyle	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia because we need to move far more quickly than we have been away from using fossil fuels for electricity. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration. The livability of our planet depends on projects like this.</p> <p>Regards, EDGAR KYLE 5124 Falcon Ridge Rd Cave Spring, VA 24018</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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17	Mark Laitysnyder	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Mark Laitysnyder 1585 Stanley Branch Rd Ferrum, VA 24088</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
18	Brian Lang	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Brian Lang 6752 Quail Pl Hollins, VA 24019</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
19	Anne Lusby-Denham	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Anne Lusby-Denham 3512 Wright Rd SW Roanoke, VA 24015</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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20	Stockton Maxwell	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Stockton Maxwell 4951 Preston Forest Dr Blacksburg, VA 24060</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
21	David McKelvey	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, David McKelvey Wyndermere Dr Laymantown, VA 24175</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
22	Bob Peckman	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. At last a step forward and a mighty nice step at that Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Bob Peckman 8131 Webster Dr Hollins, VA 24019</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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23	Thomas Powers	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Thomas Powers 1446 Valley Rd Troutville, VA 24175</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
24	Carol Pruner	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Carol Pruner 1839 Maiden Ln SW Roanoke, VA 24015</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
25	Joe Stinnett	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Joe Stinnett 6 Branch Rd Eagle Rock, VA 24085</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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26	David Todd	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, David Tod 1654 Harding Rd Blacksburg, VA 24060</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
27	Robert Trent	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Robert Trent 306 4th St Radford, VA 24141</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
28	Karen Lanning	<p>The Rocky Forge Wind Project is a poorly conceived idea in a view shed and wilderness area, and should be cancelled.</p>	Rocky Forge Wind appreciates your participation. This public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
29	Robert Egbert	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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30	Barbara Kyle	<p>Dear Mr. Johnson,</p> <p>We are far behind in replacing fossil fuels with renewable energy sources that do not contribute to the warming of the planet. Our current period of hot weather is merely a mild harbinger of what is coming, and it will be far worse if we do not change our ways to produce energy..</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Barbara Kyle 5124 Falcon Ridge Rd Cave Spring, VA 24018</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
31	Michael Bentley	<p>Dear Mr. Johnson,</p> <p>I'm a retired professor and a scientist who taught a graduate-level course in climate for many years. I'm quite convinced that the climate crisis is real and a transition to solar and wind essential, therefore I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>This wind project is an investment in our local economy - money for property owners, local government services, and schools for ~30 years. The project will also add to county tax revenue and new local jobs will be created.</p> <p>Apex has modified its Wind application to allow the utilization of new turbine technology, resulting in more efficient production. I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you .</p> <p>Regards, Michael Bentley 312 N Broad St Salem, VA 24153</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
32	Nathan Thomas	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Nathan thomas 900 Mt Moriah Rd Eagle Rock, VA 24085</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
33	Ann Martyn	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Ann Martyn 1601 Wilbur Rd SW Roanoke, VA 24015</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
34	Deborah Jacobson	see link	Rocky Forge Wind appreciates your comments and thanks you for your support.

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35	James Harshfield	<p>Dear Mr. Johnson,</p> <p>I very much support the development of renewable wind energy in Virginia. While no energy source is perfect in all respects, wind energy is very, very good compared to alternatives. We need to eliminate our dependence on fossil fuels immediately. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community. Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site. The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification. Thank you for your time and consideration.</p> <p>Regards, James Harshfield 2612 Robin Hood Road Southeast Roanoke, VA 24014</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
36	Melissa Hundley 1	Rocky Creek and Sinking Creek on landowner's property lie below the mountain, the mountain top removal, blasting for foundations and the construction of new roads will have direct effects on the amount of waterflow that will run off during a large storm.	Rocky Forge Wind has already been permitted at this location. Due to increased engineering, as well as the ability to utilize fewer turbines on the property, Rocky Forge Wind is able to significantly reduce its disturbance to the site by utilizing existing, more feasible grades and avoiding more large cut and fill areas. This reduction will only further reduce impacts from construction of Rocky Forge.
37	Melissa Hundley 2	How might extensive roads and mountaintop removal, and the deforestation that will occur of oaks and other mature trees hurt wildlife food and heat up the entire area?	The wind project has already been permitted at this location and, as indicated in the current permit application, the modifications being requested will reduce the overall disturbance footprint needed to build the project below that which is already allowed under the current permit.
38	Melissa Hundley 3	What of the remaining critters in our creeks? Won't this industrial side effects cause the creek to warm further? We have already lost our native trout and pickerel in Sinking Creek. Will we lose the Red-eye hatchery (DEQ words when they were visiting the property) and the natives in Rocky Creek?	Rocky Forge Wind has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines. Due to increased engineering, as well as the ability to utilize fewer turbines on the property, Rocky Forge Wind is able to significantly reduce its disturbance to the site by utilizing existing, more feasible grades and avoiding more large cut and fill areas. This reduction will only further reduce impacts from construction of Rocky Forge.
39	Melissa Hundley 4	Has observed and been told by DEQ that the widening of Rocky and Sinking Creeks is most likely caused by runoff from the mountain, new roads, and clear-cutting. Concerned runoff from these sources will worsen due to the Project, and flooding will occur on landowner's property, including historic barn.	Please refer to response 36.
40	Jerry Fraley	Landowner of Rocky Forge wind project. Working with Apex for 15 years. Several million spent on development and will not cause harm to the environment. The timing is great for the VA economy.	Rocky Forge Wind appreciates your comments and thanks you for your support.
41	Jonathan Cooper	Differences between this time and the last time the project was approved. The number of turbines being decreased lessens the projects footprint. The benefits far outweigh the costs. This is his family's land and the property is a reflection of his family - he asks for it to be approved.	Rocky Forge Wind appreciates your comments and thanks you for your support.
42	Dan Crawford	Chair of the Sierra Club Roanoke Group. Having Rocky Forge will be the boost VA needs. The careful work of the VA Dept of Environmental Equality is especially appreciated.	Rocky Forge Wind appreciates your comments and thanks you for your support.
43	Southeastern Wind Coalition	Furthering new technological advances in the renewable energy industry. Increased turbine height would increase jobs and production. Increasing the turbine height would allow for a lower project footprint and less installations. This will result in greater efficiency and the capture of stronger wind. The Rocky Forge project will provide an additional \$20-22 million in state tax revenue over its lifetime. This will help fund community needs.	Rocky Forge Wind appreciates your comments and thanks you for your support.
44	Matthew Cooper	He is a member of the family. Requesting that the DEQ approves the recommended changes. His family will ensure that all rules for erosion and stormwater control are met.	Rocky Forge Wind appreciates your comments and thanks you for your support.
45	Jeff Scott	Question: Why should he or anyone believe anything that Apex says or writes? The company has a long history of unethical behavior. Behaviors caught in NY, IL, TX, and VA. Apex has presented false information and made verbal/personal attacks against community members. An Apex representative did not show up to present inspection data. Apex biologist lied about a letter they received from Fisheries & Wildlife and lied about the existence of a bald eagles nest on a project site. Apex uses questionable methods to get reluctant landowners to sign, leaseholders failed to be paid as promised. Apex failed to provide training for a turbine fire. Rocky Forge Wind Project - Apex has made promises to a landowner that has not been kept. Apex should make their wind data public. Will the amount of electricity that is being produced justify the amount of irreparable harm that the project is causing?	Rocky Forge Wind appreciates your participation. This public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
46	Steve Neas 1	Question 1: Have you selected the number of turbines and the size (generating capacity) of the turbines that are going to be placed? How can a licensed engineer certify the generating capacity without confirmation of these things? He's not meeting the requirements of PBR if he doesn't have that information.	Please refer to response 75.
47	Steve Neas 2	Question 2: How can you determine the amount of carbon saved due to the intermittency of wind energy?	Please refer to response 88.
48	Steve Neas 3	Question 3: 20,000 homes served - thats an average capacity claim made by the wind industry in general and is a third of the capacity. You are not really saying what you are doing for homes wherever that may be.	Please refer to responses 67 and 74.

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49	Steve Neas 4	During the public meeting on July 27, project manager Charlie Johnson stated that Apex has not decided on the number or type of turbines to be constructed. While Apex will argue that the engineer's certification is adequate because the inter-connection agreement restricts the project to 78MW, the inter-connection agreement does not prevent Apex from constructing more than 100 MW. This engineer is in error by making a certification. Apex could build more than 100 MW by erecting 22 towers and using the GE Cypress 5.3 MW turbines on each. Licensed professional engineers have a duty to protect the public. The PBR statute has a specific requirement for an engineer to certify the project as designed (emphasis mine) does not exceed 100 MW. Without a true design, the engineer cannot accurately and honestly make the certification. Because Apex has not provided the specific make and model and number of the turbines, DEQ must find that this certification does not meet the regulation as required by 9VAC15-40-30 Part II A.5	Please refer to response 75. Because the maximum capacity as set out in the Interconnection Services Agreement is 78.2 MW, the engineer's certification is appropriate.
50	Steve Neas 5	A public meeting was held from 5pm to 7pm on July 27. Because of special conditions the meeting was held by tele-conference. Apex gave their typical description of the project and then the public was allowed to call in with questions or comments. Each caller was restricted to three minutes. Apex would respond to the question or comment, and then take the next caller. Apex did not restrict their response to 3 minutes. Callers were restricted to only one three minute period. Callers that attempted to call in a second time were not allowed a second three minute period. This format does not meet the intent of the regulation for a public meeting. There was not opportunity for a discussion. The format only allowed for a question then a response. There was not opportunity for a caller to call back to ask for clarification or rebut the assertions that were made. Since the words and spirit of 9VAC15-40-90 were not met, DEQ must find that the application is incomplete.	Please refer to response 92.
51	Steve Neas 6	Apex claims that the Rocky Forge project is a benefit to the environment by preventing the following emission: 185,870 tons of carbon dioxide 223,390 lbs. of nitrogen oxides 290,800 lbs. of sulfur dioxide. They claim these "calculations are estimates generated based on projected annual production of the Project as modified with offsets calculated utilizing the EPA AVERT Tool at <a href="https://www.epa.gov/statelocalenergy/avert-web-edition">https://www.epa.gov/statelocalenergy/avert-web-edition.</a> " I visited this website and attempted to reproduce the results they claim. Guessing at generation potential I could not come anywhere close to their claims. Regardless, if Apex cannot produce information that others could verify then the information is useless. Technical transparency is about giving adequate information such that others could arrive at the same conclusion. As such this information cannot be verified by others and should be deleted from the application. Additionally, this tool does not include calculations on life to grave impacts and emissions created in the construction, manufacture, and transportation required to construct the project. Not to include such information in the claims of reduced impacts to the environment are misleading. Either show it all and be transparent or make no claims.	Please refer to response 88.
52	Jonathan Miles	Professor at the School of Integrated Sciences... He used to work on an advisory panel and knows how much has to go into this process. He gives all the credit to Apex for overcoming such hurdles. It is also important to reflect on the fact that technology has changed a lot in the past few years. Though there has been criticism of Apex for offering modifications to the project, it is important to recognize Apex has done its due diligence to accommodate these new technologies and changes in the renewable energy. This will serve as an important example for future clean energy projects.	Rocky Forge Wind appreciates your comments and thanks you for your support.
53	Tenney Mudge 1	Comment on the critical pre-construction breeding bird surveys. In the modifications, Apex is quoted saying it is not 'expected' that the project would have an effect on breeding birds. The results that Apex is reporting are invalid according to DEQ PBR Regulations. It is 5 years ago (July 31, 2015) that Apex completed the breeding bird surveys. According to the regulations, the number of years that the bird surveys remain valid is 1-2 years. A negative survey must be re-done. Rocky Forge is located in a golden eagle habitat	The PBR guidelines recommend that surveys for state-listed species with the potential to occur in the Project area be refreshed every 1-2 years if the species was confirmed absent from the area previously. These are guidelines only and DGIF has indicated that no additional avian surveys are required for the proposed modifications. Golden eagles are not state listed, and the project has documented presence for peregrine falcon and bald eagle (although this species has been downlisted since the 2017 PBR guidelines), therefore this recommendation would not apply. Although loggerhead shrikes have not been identified on the Project site, the proposed modifications are located primarily in areas that do not provide loggerhead shrike habitat. Of the additional 18 acres of disturbance included in the modification, there is only one 0.11 acre area of potential low quality low probability shrike habitat. Impacts to this area will be minimal, and there is no scientific basis to the assertion that additional breeding bird surveys are needed to evaluate potential impacts given spatial coverage of surveys completed to date.

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54	Tenney Mudge 2	<p>The bottom line is that any negative pre-construction survey for breeding birds has surpassed its shelf life and validity according to PBR Regulation and Guidance. The Regulation and Guidance on pg. 7 of PBR Section II Methodology under Wildlife Analyses defines SHELF LIFE as the number of years a negative survey, a survey where NO State-listed species is found, remains valid. In accordance to regulation, the number of years a negative survey for State-listed birds remains valid is 1-2 years depending on species. Apex did another desk top survey for the Modified Application. The number of Federal and State-listed threatened and endangered species and State-listed Tier 1/Tier 2 Species of Greatest Conservation Need (SGCN) with potential to occur within the project area for avian species was 17 in the original application and 11 in the Modified Application. The regulation and guidance state that the applicant will perform field studies including breeding bird studies during the annual breeding season which Apex did – over 5 years ago.</p> <p>Apex states in the Modified Application that in a phone call with DGIF on May 20th, 2020, DGIF said that no new analyses were needed.</p> <p>The Modified Application states that “the breeding bird survey reports confirm that due to the location and nature of the proposed wind project, it is not EXPECTED to have a significant impact on breeding bird species. The Modifications requested in this application do not change the results of this analysis.” These surveys analyses they are quoting in the Modified Application are invalid according to DEQ PBR regulations. APEX and DGIF are ignoring that the results of the analysis are governed by the DEQ Permit by Rule requirements (9VAC15-40-40.A and the Code of Virginia 10.1-1197.6 B7) for Wildlife Analyses. Beginning in 2014 through July 31st 2015, Apex completed the required breeding bird surveys for the original Apex PBR application. The Apex original application states on pg. 15 item 2. Breeding Bird Surveys - NO State-Listed threatened or endangered species were observed and that only two Tier Two SGCN were documented (Cerulean warbler and Swainson’s Warbler). If No State-listed threatened species were found in on-site pre-construction surveys – these surveys are therefore negative. If only two SGCN species were found – then all other on-site surveys for species indicated in the desktop surveys would therefore be negative. In accordance with DEQ regulation, the shelf life of these negative pre-construction surveys for State- species have exceeded the number of years they remain valid by at least 3 years. In addition, in April 2015, West conducted an aerial raptor nest survey to locate bald eagle nests and other raptor nests in or within 4 miles of the project to assess potential effects of the project on breeding eagles and other raptors. The application states that NO bald eagle nests or nests of other raptor species were observed during the survey. The aerial raptor nest pre-construction surveys are therefore negative for State-listed species, including Golden Eagles, and have exceeded their shelf life according to PBR Regulation and Guidance. The PBR Regulation states “To fulfill the requirement of 10.1-1197.6 B7 of the Code of Virginia the applicant shall conduct preconstruction wildlife analyses to include Breeding Bird Surveys”. It is common sense that surveys must be valid to satisfy the PBR regulation and must be updated for the Modified Application to be complete. It is essential that the Modified Application be in compliance with DEQ Regulation and Guidance for the DEQ definition of shelf life and validity of pre-construction surveys. Required pre-construction breeding bird analyses that were negative surveys and were done from 2014 to July 2015 must be resubmitted. There’s no room for error or non-compliance by Apex, Botetourt County, for DGIF or DEQ.</p>	Please refer to response 53.
55	Danny Coffey	I have been involved in windmill construction for the past 12 years and have met with Apex about this particular project. I know there are people who go out and check to see if an animal has been killed - I know that the windmill sites are clean, and I have never seen as much game in the area as I have since the wind sites have been leased. Everyone in the community is happy and all of the workers make good money. We all don't like change but change is here. There should be no reason that there is any pushback to these projects.	Rocky Forge Wind appreciates your comments and thanks you for your support.
56	Peter Elliot	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site. The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Peter Elliott 6101 Olivet Dr Alexandria, VA 22315</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

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57	Hsui Pinder	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Hsiu pinder 6342 S Sky Ct Gilbert, AZ 85298</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
58	Diane Roberson	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Dianne Roberson 76 Westridge Dr Daleville, VA 24083</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
59	Southeast Wind Coalition	see link	Rocky Forge Wind appreciates your comments and thanks you for your support.
60	Tenney Mudge 3	<p>The DGIF, even states the Eastern Golden Eagle is believed to be a "small and potentially vulnerable population" that is geographically isolated and potentially distinct." It has federally protected status and is a State designated Tier 1 SGCN by the Commonwealth of Virginia. Apex consultants, WEST, support telemetry data that there are Golden Eagle concentrations on and in the siting of the Project Area. WEST reports 6 of the 8 Golden Eagles sited in the Avian Use Survey were within rotor swept heights and two flew across the area of the proposed turbines. This report was referring to 550' turbine height not 680' height which will have a grossly increased blade sweep. Dr. Michael Hutchins, of the world renowned American Bird Conservancy has submitted multiple letters expressing that the Conservancy OPPOSES the poorly-sited Rocky Forge project and it is located in a GLOBALLY Important Bird Area. Dr. Hutchins has submitted in writing that Rocky Forge is cited precisely in the concentrated migration and NESTING location of the small and potentially vulnerable population of the Eastern Golden Eagle. This species is strictly protected by 3 Federal Acts and Treaties. For a population as fragile as the protected Eastern Golden Eagle as well as other species it is deeply concerning that Apex could receive DEQ approval for the PBR Modified Application with Breeding Bird pre-construction surveys that are invalid in accordance to DEQ PBR regulation. There is no room for error or non-compliance. I voiced these concerns in the Apex phone comment session on 7.28.20 and they were basically not addressed and were simply dismissed. Please address and answer to the above issues concerning pre-construction breeding bird surveys and the facts that the negative surveys are invalid by DEQ PBR Regulation and Guidance definition. Thank you</p>	<p>The eastern population of the golden eagle is small relative to the western population, having approximately 5,000 individuals as opposed to approximately 30,000 individuals in the western U.S. Eastern golden eagles breed in Canada, exclusively, and migrate through and winter in the eastern U.S. There is no evidence that changes in turbine height change risk to golden eagles. There is an extensive build out of wind turbines on Appalachian ridgetops in areas of Pennsylvania that experience concentrated golden eagle migration; despite state-required, intensive fatality monitoring at these sites, no eastern golden eagles have been discovered as fatalities at any wind farm east of Michigan. The species is protected under the Bald and Golden Eagle Protection Act, which provides an incidental take permitting process. If a wind project is likely to kill or disturb golden eagles, the project may engage in the federal permitting process to obtain an incidental take permit that secures avoidance and minimization measures for golden eagles as well as compensatory mitigation for any fatalities that occur in order to maintain stable or increasing populations of the species. If Dr. Hutchins asserts that Rocky Forge is sited within the nesting range of the golden eagle, he is mistaken, as the nearest nesting location of the species is hundreds of miles north in Canada.</p>
61	Wendy Richards 1	<p>Public Comment to Apex's plans to install the Rocky Forge Wind Project: In my opinion, the planned installation of the Rocky Forge Wind Project in Botetourt County, Virginia should not go forward. The site is not suitable for an efficient capture of wind energy. I am a 38 year resident of southern Rockbridge County, I live about 5 air miles from the proposed site and I can vouch for the fact that the amount of wind we experience in this area is slight. There is no clear evidence that the Rocky Forge site will be a productive producer of energy. Respectively submitted, Wendy E. Richards 2105 S Buffalo Rd Lexington, VA 24450 540-463-5214</p>	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines.
62	Wendy Richards 2	<p>The amount of destruction and disturbance to a scenic natural area that will be involved in clearing an area to install 22 of the proposed 680 foot wind turbines does not make sense economically or ecologically. I am a proponent of wind energy in the right location but Rocky Forge, along the ridge top of North Mountain should be left as it is.</p>	The PBR modification requires that Rocky Forge Wind conduct a viewshed analysis for the change in turbine height and identify the impacts on federal and state designated scenic resources. The Visual Assessment Report prepared by Hill Studio documents this analysis. As shown in the Hill Studio report, visual impacts to scenic resources resulting from a potential 130 ft increase in turbine height from what has already been permitted, will be negligible.
63	Wendy Richards 3	<p>Furthermore, the proposed wind turbine site is located on the edge of the Allegheny Highlands which is an area recognized by Audubon as a Globally Important Bird Area due to the presence of migrating birds. It is common knowledge that many species of birds are drastically declining, largely due to habitat loss and disruption. It is inconceivable to me that with all the documented and well researched incidents of bird deaths caused by wind turbines that this project would go forward.</p>	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines. Please also see response 137.

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64	Wendy Richards 4	One of the most vulnerable species that migrates throughout the Valley and Ridge region is the Eastern Golden Eagle. I have been fortunate enough to see this magnificent species on at least two occasions as it flew over our farm. The specific dates are January 20, 2013 and January 7, 2019.	Apex appreciates your interest in eagles and provision of observational information. Systematic surveys were conducted to sample use of the Project by golden eagles and use by the species has been adequately characterized for the entire Project area.
65	Wendy Richards 5	I have always valued the wide diversity of wildlife that inhabits this relatively undeveloped area of Virginia. I feel that if this project goes forward we stand to lose much more than we will gain.	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines.
66	Gretchen Sukow	Wind Turbine Projects are certainly needed for a sustainable future, but the particular site for this one is poorly chosen. It puts avian wildlife and nearby wetlands at significant risk. This project should be cancelled.	Rocky Forge Wind appreciates your participation, but this public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
67	Steve Richards	I wrote a comment for the previous application stating that this is a poor site for wind generation because of diminishing winds at this latitude caused by warming in the Arctic. That comment was dated June 5, 2016. I won't belabor the point, it should be a matter of record and it includes a reference to an article in Science, 17 April 2015. My wife and I live within 5 miles of the site (although we are not in the view shed), and we have observed no wind for the past seven weeks, except for brief gusts associated with passing thunderstorms. Last evening we paused our busy lifestyle and spent an hour observing the sunset and some clouds. They did not move for the hour we observed them. A two mile high turbine would still have been consuming electricity, not generating it. Hopefully the people of Virginia are not financing this boondoggle, it's bad enough that we will have to buy the "green" power, no doubt at a premium. Take all the money and install solar, we would get a lot more energy for the effort and not ruin amountaintop and the view shed	According to our analysis of onsite data from 4 MET towers and 2 sodar units, the location is suitable for a wind project. The wind speeds shown on publicly available maps are not accurate for this site. Onsite data document higher speeds. Rocky Forge Wind is confident in the projected amount of electricity stated in this application and on project information pages. Please note, that whether the wind is sufficient to support the proposed project is a business decision for Rocky Forge Wind and not an element of review by DEQ under the PBR regulations.
68	John Wise 1	I was unable to open the entire list of 498! species of known or likely species of animals that are likely to occur within a two mile radius OF A SINGLE POINT in the development. My concern is that studies have not been done to evaluate the increased harm especially to birds and bats by the increased height, increased swept area and the increased tip speeds that the fewer, but bigger turbines may cause. I feel that more studies need to be done on this before approving any permit for Rocky Forge. Once built and damage done there is no recourse to ameliorate damage to (especially) for rarer and less robust species. The 'deal' between Apex and the 'Commonwealth' for "green energy" from R Forge seems to create a potential conflict of interest when scrutinizing this project for natural resource issues.	Height of turbines has been taken into account in assessing risk. The increased height of the turbines will cause the rotor swept area to occupy greater heights above ground. When traveling along or across ridges in this region, particularly in winter, golden eagles tend to make use of updrafts produced by deflection of winds by the ridge structure; these updrafts are available only close to the ground, so eagle flights during this time also are close to the ground. Extending the rotor blades upward therefore moves collision risk away from the most frequently used golden eagle flight heights. In terms of the rotor swept area, use of a taller turbine will actually reduce the overall rotor swept area because fewer turbines will be required. Per the USFWS collision risk model, collision risk for eagles is a function of the area swept by rotors, therefore reduced rotor swept area equates to a reduction of collision risk from the original design.  The originally authorized Project consisted of up to 25 turbines with a maximum height of 550 feet. The representative turbine for the originally authorized Project was the N131, 3.0 MW turbine, which would have resulted in a project swept area of 336,955 m2. The modification proposes to install up to 22 turbines with a maximum height of 680 feet located in the same footprint along the ridgelines within the disturbance zone. Ultimately, Rocky Forge Wind will use wind turbines that are suited for the area, provide long-term functionality, and are manufactured by companies that have a proven track record in wind turbine production. The chosen turbine will comply with Botetourt County ordinances and PBR requirements and will meet the needs of the Project. Given the request to keep up to 22 turbines in the modification application, and in response to public comment, Rocky Forge Wind commits to a final project configuration of number of turbines and wind turbine rotor diameters that results in a rotor swept area that is less than 336,955 m2.
69	John Wise 2	I am NOT sure if the revised plan is to light the towers but if this is a change, then the effect of the light on animal mortality needs to be considered also before approving any permits.	Rocky Forge Wind must comply with regulations set forth by FAA regarding lighting of the wind turbines at night. Though the lights are made to be visible to aircraft, it is not expected to be a significant cause of light pollution to the region. Rocky Forge Wind has committed to managing lighting around the facility to minimize impacts to wildlife.
70	Jeffrey Scott	Dear Mr. Johnson, I am opposed to Rocky Forge. And it is extremely disappointing to see that the Roanoke chapter of the Sierra Club is participating in the endorsement of this ill-conceived and environmentally destructive project. In the Feb. 10 Roanoke Times there was a commentary by Dan Crawford, chair of the Sierra Club Roanoke Group titled "Rocky Forge site is close to perfect". Mr. Crawford appears to have drunk the Kool-Aid being served by Apex Clean Energy. When Mr. Crawford writes that "The Rocky Forge site is as close to perfect as we can expect", he either has not read, or is choosing to ignore, the Wind Siting Advisory of the national Sierra Club ( <a href="https://www.sierraclub.org/policy/energy/wind-siting-advisory">https://www.sierraclub.org/policy/energy/wind-siting-advisory</a> ). In part, that advisory states: "The Sierra Club opposes development in protected areas such as national and state parks, national monuments, wilderness areas, wildlife refuges, designated roadless areas, critical habitat and designated habitat recovery areas for wildlife, and areas of cultural significance, sacred lands, and other areas that have special scenic, natural or environmental value. In these areas, it is inappropriate to build wind turbines, roads, transmission lines, or any other structure related to wind development." Does Mr. Crawford know, or is he choosing to ignore, that North Mountain, the site for Rocky Forge is located in the Buffalo Creek - Purgatory Mountain Wildlife Corridor? Does Mr. Crawford know, or is he choosing to ignore, that the Botetourt Comprehensive Plan states: "Preserving scenic views and vistas is particularly important for Botetourt County. The County's scenery is critical to the rural character and is one of its most distinguishing features. Does Mr. Crawford know, or is he choosing to ignore, that the proposed turbines will be visible from the Blue Ridge Parkway? Does Mr. Crawford know, or is he choosing to ignore, that the Upper James River (which flows at the base of North Mountain) is a designated Virginia Scenic River? The list goes on of information that Mr. Crawford is either ignorant of, or is choosing to ignore, on why the Rocky Forge site is as close to the worst site as possible for such an industrial development project. Regards, Jeffrey Scott 1023 Smokey Row Rd Lexington, VA 24450	Rocky Forge Wind appreciates your participation. This public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
71	Karen Lanning	The Rocky Forge Wind Project is a poorly conceived idea in a view shed and wilderness area, and should be cancelled.	Rocky Forge Wind appreciates your participation. This public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
72	Anonymous	In one inset graphic in the Rocky Forge Site Plan, the dimensions of the apparent turbine tower base are indicated as 35.5' in radius, or 71' in diameter. What is the actual tower base diameter for the Rocky Forge turbines, and will they be concrete or steel? A recent study indicates turbines with concrete towers produce less noise--an environmental benefit.	The dimensions being referred to are for the estimated underground foundation size, should a spread-footer style foundation be used. The final turbine has not been chosen to-date, but will evaluate all reasonable options for concrete or steel towers. The final equipment will have to meet local noise standards.

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73	Anonymous	This engineering drawing indicates each tower radius is 35.5 feet, or 71 feet in diameter, base height. The visual assessment appears to have used 16 feet diameter, base height. Please explain the discrepancy. Which tower diameter is correct?	The dimensions being referred to are for the estimated underground foundation size, should a spread-footer style foundation be used. The final turbine has not been chosen to-date, but Rocky Forge Wind will evaluate all reasonable options for concrete or steel towers. The final equipment will have to meet local noise standards.
74	Anonymous	"Expected to generate" is not a specific condition. Neither is "up to 20,000 homes annually". What quantity of electrical power does Apex guarantee to be produced as a minimum each year, in kWh, and what portion is expected to be produced each month, including the months when the turbines are stopped at night to prevent bat deaths?	The projection of up to 21,000 homes for the modified Project uses the average projected production derived from our onsite wind data, divided by the average U.S. home electricity use per year. This is done on an average annual basis.  Our onsite wind data is refined based on a representative turbine model to predict the hourly production of the wind farm for the entire year. This includes the curtailment commitments in the mitigation plan. This data is then used to model the entire cost of the project, to ensure it is a feasible investment.
75	Anonymous	Please explain--how it is possible for a professional engineer to certify the maximum output of the project is less than 100MW when Apex has not yet publicly specified which make and model of wind turbine has been selected for the project, and exactly how many turbines will be erected?	The Interconnection Service Agreement with PJM limits the project capacity to 78.2 MW to be constructed onsite. Ultimately, whichever turbine is chosen for the facility, the entire project's capacity will have to be equal to or less than 78.2 MW, thus below 100 MW.
76	Anonymous	Verified by whom? The wind resource cannot be validated without the wind data from the North Mtn. meteorological towers being public, and these data have never been made public. Will Apex publicly provide a standard Wind Rose diagram for each month in a calendar year, for all the years the MET towers have collected data, containing the wind speed, wind altitude, direction, and duration? This should be necessary for DEQ evaluation prior to being granted application complete status. Wind rose diagrams are necessary to validate that sufficient winds exist (benefit) for the project to be with the immense costs (environmental damage, visual viewshed destroyed, local property values reduced, etc.)	Apex has complied and will continue to comply with local, state, and federal disclosure requirements. Please refer to responses 67 and 74.
77	Anonymous	Please explain--very specifically, not generally--how is it possible to reduce the need for traditional energy generating facilities when the wind does not always blow, and traditional energy sources must be in "hot-standby" mode at all times to prevent electric brown-outs and black-outs?	Rocky Forge Wind appreciates your participation. This public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).  Production from wind farms, though not consistently producing energy 100% of the time, has become very predictable given the technology in meteorology. This allows for the grid operators to manage the other generation sources accordingly, as seen in the Midwest at a much higher penetration rate than in Virginia thus far.
78	Anonymous	Note the correct spelling of "Assessment". This header section of your RF Public Comment website has three misspellings on three successive lines. Is this a Freudian slip? This reflects poorly on Apex's attention to detail, and makes one wonder...what other oversights exist in Apex's haste?	Rocky Forge Wind appreciates your participation. This public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
79	Anonymous	I live within a 10-mile radius of the proposed Rocky Forge project. Dozens of Little Brown Bats have lived in the roof of my house off and on over the last 3 years. One died, and I have this creature in my freezer as evidence. Citing specific and recent studies, how does Apex claim that the threat to this species from Rocky Forge is low?	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines. Potential impacts to bats, regardless of turbine height, will be minimized through various avoidance and minimization measures that will be implemented by the project, as outlined in the Mitigation Plan that was submitted with the initial application.
80	Anonymous	Any disturbed soil within at least the last five years in northern Botetourt County is highly likely to contain Japanese Stiltgrass, one of the 10 greatest invasive species in this area. Japanese Stiltgrass is highly likely to be growing today on the road shoulders leading up to the Rocky Forge project area. Specifically, what steps, at what locations, and at what stages of construction and operations will Apex take to ensure Japanese Stiltgrass does not invade the project site?	Rocky Forge Wind appreciates your participation. This public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).  As set out in the Operations and Maintenance Plan, Rocky Forge Wind will use best management practices to minimize the risk of bringing introducing species to the project site.
81	Anonymous	The Rocky Forge site will be readily visible from McAfee's Kn.ob (I can't spell it correctly because this site's Terms & Conditions prevent it), one of the best-known views on the entire Appalachian Trail, right in the middle of that viewshed. Is not McAfee's Kn.ob a state-designated scenic resource? The collection of wind turbines proposed, as seen from McAfee's Kn.ob, will appear as a man-made structure on a mountaintop against the horizon over 0.6 miles wide, easily observed, and destroying the visual impact of this spectacular scenic overlook. The potential sensitivity to the viewer to this change at this location is very high. With the massive size of this project, why was the Hill Studio assessment limited to only a five-mile radius around the project site? How does Apex intend to mitigate this issue? How does Apex intend to compensate for the damage rendered?	Local and state regulations require scenic resources to be evaluated out to 5 miles. Rocky Forge Wind went beyond this distance, even to over 14 miles when evaluating the Mills Gap Overlook on the Blue Ridge Parkway. In consultation with Hill Studio, though the windmills may be visible on a very clear day based on the terrain between the two points, 26.2 miles is very, very far away from the windmills within the settled landscape context and haze usually associated with the southern Great Valley. Visible signs of this settled landscape are located closer to McAfee's Knob than the Rocky Forge Wind project.
82	Anonymous	The entire stretch of the James River in Botetourt County, 45 miles, is a Virginia Scenic River, not just the 9.2 miles that were designated scenic when the study was conducted. Apex should not be able to obtain DEQ application complete status while using inaccurate values from an outdated study. Will Apex update the percentage and miles of the project being within the area of potential visual effect using all of the James River prior to requesting DEQ evaluation? Has Apex asked whether erecting the turbines will cause the James River to lose Scenic River status, and if so, what is the answer and what formal source provided it? Does Apex intend to compensate local businesses (such as those that rent canoes) for the potential loss of revenue from the tourists that will now stay away?	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines. As can be seen in the Visual Impact Report, the change in visual impact with the height increase of the turbines is negligible. Only 9.2 miles of the river are located within the 5-mile study area, while less than that is in the area of visual effect.
83	Anonymous	It is misleading to indicate Apex has obtained all necessary environmental permits, as some of them have expired and need to be done again since five years have passed from the original submission to DEQ. Apex should not be allowed to obtain DEQ submission completion status until all necessary environmental permits are obtained AND ARE STILL VALID. Will Apex please provide a table of all required environmental permits, the period of validity of each, when each permit was obtained, and when expired permits were re-accomplished?	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines. Additional permits for these revisions are being sought (PBR) or have been obtained as indicated in the current permit application. The project will obtain all permits required by applicable local, state, or federal law to construct and operate the project.
84	Steve Richards	I wrote a comment for the previous application stating that this is a poor site for wind generation because of diminishing winds at this latitude caused by warming in the Arctic. That comment was dated June 5, 2016. I won't belabor the point, it should be a matter of record and it includes a reference to an article in Science, 17 April 2015. My wife and I live within 5 miles of the site (although we are not in the view shed), and we have observed no wind for the past seven weeks, except for brief gusts associated with passing thunderstorms. Last evening we paused our busy lifestyle and spent an hour observing the sunset and some clouds. They did not move for the hour we observed them. A two mile high turbine would still have been consuming electricity, not generating it. Hopefully the people of Virginia are not financing this boondoggle, it's bad enough that we will have to buy the "green" power, no doubt at a premium. Take all the money and install solar, we would get a lot more energy for the effort and not ruin a mountaintop and the view shed.	Rocky Forge Wind appreciates your participation, but this public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).  Please also see response 74

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85	Jeff Scott pages 1-2	Submitting documents as submitted to Botetourt County officials, staff and citizens	Rocky Forge Wind appreciates the submittal of records from the county land use process. Botetourt County has approved the requests that are currently being submitted as a modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
86	Virginians for Responsible Energy 1	PBR Modification Issues (summary of their main points) A. Rocky Forge Wind failed to provide new interconnection documentation as required by VA Code 9VAC15-40-100(B). The failure to include the interconnection studies and interconnection agreement in the PBR Mod. diminished the public's ability to participate in the hearing for and comment on the the application	No new interconnection documents have been prepared or are necessary. The documents submitted as a part of the original PBR application are still applicable.
87	Virginians for Responsible Energy 2	B. The design of the Project is still in flux (number and type of turbine, substation design), thus the Maximum Generation Capacity Certification performed by Daniel Jamison is invalid	The Interconnection Service Agreement with PJM limits the project capacity to 78.2 MW to be constructed onsite. Ultimately, whichever turbine is chosen for the facility, the entire project's capacity will have to be equal to or less than 78.2 MW, thus below 100 MW.
88	Virginians for Responsible Energy 3	C. The Project does not provide any of the data used for modeling via the EPA AVERT tool. The total environmental impact of the Project should include the impact of mining the rare earth and minerals for turbine components, transporting the turbines, construction activity etc.	The project is using the projected hourly production at the project site based on the wind measurements taken at the project site. This data is proprietary in nature. Similar projections can be run using the AVERT tool to understand averages based on national wind maps for a generic region, such as the "Great Lakes/Mid Atlantic" or the "Southeast" through the tool, but these averages underestimate the production at the Rocky Forge Wind project site, thus the discrepancy the commenter is likely finding.
89	Virginians for Responsible Energy 4	D. Rocky Forge Wind did the bare minimum analysis to understand impacts to surrounding natural resources, including wildlife, birds, bats, historic resources, light pollution, sound, and visual impact.  Attachment 7B was not available on project website for review.	Rocky Forge completed all recommended and required surveys in accordance with PBR regulations and agency recommendations.  Rocky Forge Wind did not receive any notice of the broken link for viewing attachment 7B, however the print version was available for review in the locality, and the applicant would have gladly fixed the link had it known about the problem or sent the study by email for review upon request.
90	Virginians for Responsible Energy 5	E. Rocky Forge Wind has made released no new mitigation plans, and the Mitigation Plan Design Certification provided by Daniel Jamison is invalid considering the new design of the Project is in flux	The Mitigation Plan for the Project has not changed because the requested modifications do not impact the prior Mitigation Plan. Therefore, the certification provided by Daniel Jamison is valid.
91	Virginians for Responsible Energy 6	F. Rocky Forge Windhas released no new operating plans. The outdated operating plan submitting in the Project's first PBR application states that the Project does not interfere with FCC facilities. Given the turbine height has changed since the first application, these findings are no longer valid and a new study should be performed to determine whether the taller turbines will interfere with FCC facilities.	The Operations and Maintenance plan has not changed because the requested modifications do not impact the prior plan. The studies for FCC facilities are not a requirement for this PBR modification application. They may be re-run as needed during the development process.
92	Virginians for Responsible Energy 7	Rocky Forge's public meeting by telephone was a poor substitute for an in-person meeting. During the meeting, held for approximately two hours on July 28, 2020, phone-in comments were limited to just three minutes, and the caller was neither permitted to ask any follow-up questions nor even make a subsequent comment. As there were only ten callers over the length of the meeting, simple math reveals that 90 minutes—3/4 of the time allotted for the meeting—was reserved for Rocky Forge/Apex, the slim remainder for the public, i.e., those who are supposed to benefit the most from the public meeting requirement. It is clear that Rocky Forge/Apex, who presided over the meeting and recited their position on the Industrial Wind Project multiple times, neither "identif[ie]d issues of concern" nor "facilitate[d] communication" and "establish[ed] a dialogue between [itself] and persons who may be affected by the project" in any meaningful sense, as contemplated by DEQ regulations enacted to effect Virginia Code § 10.1-1197.6.	Rocky Forge fulfilled its public meeting obligations under VA Code 10.1-1197.6 and in accordance with the State of Virginia's Emergency Order and the DEQ approved telephonic meeting procedures for the Project. Rocky Forge Wind spent all response time responding to questions or presenting information on the application. 25 individuals participated in the telephonic public meeting and 11 individuals chose to comment/ask questions during the meeting. Rocky Forge Wind provided access to the digital version of its modification application on its website to provide the public with an easily accessible version of the documents. The website also provided an opportunity for the public to ask questions about the project and post comments. All interested individuals also had an opportunity to ask Rocky Forge Wind representatives questions via email or telephone and to provide written comments both online and by letter or email.
93	Virginians for Responsible Energy 8	In sum, the golden eagle is a vulnerable species appropriately protected internationally, federally, and at the state level. The importance of preserving this bird of prey invalidates Rocky Forge's reliance on old, inapplicable studies. Instead, Rocky Forge should conduct (or DEQ should require) new, additional studies on how the PBR Modification will impact golden eagles, and amend its proposed mitigation plan (which is also outdated) accordingly. Importantly, this would comport with USFWS guidance: "Even for permits with low fatality predictions, we believe it would be remiss not to review whether eagle take is within the authorized level, and whether there are elements of the adaptive management strategy that should be implemented."	The golden eagle is federally protected in the U.S. by the Bald and Golden Eagle Protection Act. Implementing Guidance for this act (ECP Guidance) recommends types of study that can be used to assess risk to the species during Project development. The golden eagle is not a state-listed species in Virginia. Surveys conducted for the Project followed recommendations in the ECP Guidance and from VDGIF in surveying the Project area for indications of risk to golden eagles. The sampling conducted for golden eagles was spatially and temporally representative of the entirety of the Project and was used to assess the potential for impacts to this species. There is no evidence to suggest that the proposed modifications to the PBR change the risk to golden eagles. Rocky Forge Wind Project will operate under an adaptive management strategy that will facilitate adjustments to changes in the assessment of risk to eagles as operation of the project proceeds.
94	Virginians for Responsible Energy 9	It cannot be said that the FAA has approved the Industrial Wind Project with respect to its obstruction potential in any final sense. Until Rocky Forge makes a final determination as to its design of the Industrial Wind Project—which any reasonable developer would have done long ago, not beyond the eleventh hour in the PBR process—the FAA's determination is effectively tentative. It would therefore be prudent for DEQ to delay its decision on the PBR Modification until whether the FAA's determination will stand is made unquestionably clear.	Issuance of Determinations of No Hazard by the Federal Aviation Administration is a separate process from the modification to the previously authorized state Permit By Rule (Registration No. 2017-W01). Rocky Forge Wind will comply with all applicable federal requirements.
95	Virginians for Responsible Energy 10	Rocky Forge's claim that the Industrial Wind Project will provide energy for upwards of 21,000 homes is dubious. The wind data for North Mountain, where the Industrial Wind Project will be situated, is not publicly available. Instead, citizens have been provided with only a superficial summary. Under such circumstances, it is by no means certain that the wind to be utilized by the Industrial Wind Project will be sufficient to generate at the level of power Rocky Forge has generously estimated	Please see responses 67 and 74.

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96	James Breakell	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, James Breakell 525 Clydesdale St SW Roanoke, VA 24014</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
97	Dave Condon 1	Have the plans been drawn up to include the exact amount of turbines with Latitude and longitude being noted? In addition, have you included in those plans any means to control runoff into the James River in the event of flooding during construction. I heard those plans were necessary before moving forward for approval.	<p>The project is currently finalizing the exact number and locations of the turbines within the disturbance zone studied. Due to increased engineering, as well as the ability to utilize fewer turbines on the property, Rocky Forge Wind is able to significantly reduce its disturbance to the site by utilizing existing, more feasible grades and avoiding more large cut and fill areas. This reduction will only further reduce impacts from construction of Rocky Forge.</p> <p>The project will be constructed in accordance with local, state and federal regulations relating to water quality (including stormwater and erosion and sediment control regulations) to protect water quality within and surrounding the area being developed.</p>
98	Dave Condon 2	CDC did a report at the request of a turbine blade manufacturer and that report (on file with Botetourt County, stated under the best safety controls, fiberglass airborne dust was still very high. Should that dust settle or runoff on the James River, again that will fall under the federal Chesapeake Bay Clean Water Act. Thus a plan to prevent runoff into the James River is in order before any approval by the Department of Environmental Quality. Where is that plan?	This comment fails to identify the CDC report name. One such report can be found online and concerns dust associated with the manufacturing process at turbine blade manufacturing plants. Such reports provide no indication that dust as an industrial byproduct of turbine blade manufacturing is an environmental hazard when the final product is deployed for use.
99	Dave Condon 3	Appx. 7 years ago, an earthquake of 5.7 or better was felt in Glen Allen, VA just north of Richmond which was felt in Washington and as far south as Pulaski. I felt it in Pulaski. Today at 8 am, there was a 5.1 magnitude earthquake near the border of North Carolina and Virginia. There are two properties I know of that felt that earthquake within 2-4 miles of Eagle Rock, VA. I will be glad to provide the two names and addresses to the DEQ but there are others who felt it as well. In your plans, are the turbines designed to withstand earthquake activity. Although not well known, there is an underlying fault line under these mountains. Given what happened today, I am asking the DEQ to require those plans before any approval to confirm the turbines can withstand seismic or earthquake activity.	Apex has followed all DEQ requirements for the modification request. Seismic information is not required by PBR regulations.
100	Lisa Connors 1	I would like to express my concern for the Rocky Forge Wind Project as a neighbor in adjacent Rockbridge County, Virginia. I feel this project is not considering the severe environmental impacts of installing such large and heavy turbines on a mountain ridge. Soil erosion and stream water pollution will occur as well as impact to migrating birds. I do not believe any positive gains of energy created outweigh the damages.	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines. All required soil erosion and water pollution requirements have been or will be fulfilled, as well as studies and mitigation related to wildlife.
101	Lisa Connors 2	While these environmental costs seem abstract to some, they do indeed exist both literally to humans financially and to the ecology of the landscape. If those making these decisions need more tangible costs, there is also the cost to adjacent property values from this project, and possibly an impact to tourism in the area. There are better places to install wind turbines and other ways to create energy that are less damaging. However, I do not believe I am alone in thinking there are better ways to grow as a company and projects such as this one are too risky to ensure long-term viability.	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines.

Row ID	Commenter	Summary of Comment	Apex Response
102	American Bird Conservancy 1	<p>Foremost among our concerns is the risk that this project poses to the Eastern population of Golden Eagles. An April 2016 report from the U.S. Fish and Wildlife Service (USFWS)<sup>1</sup> estimated that there are approximately 5,000 Golden Eagles in the species' Eastern population, accounting for less than 13% of the nationwide total. This was a considerable increase from previous estimates, which placed the Eastern population at 1,000 – 2,500 birds.<sup>2</sup> Studies agree that populations are likely decreasing, though the USFWS report suggests that it may be stable. Indeed, prior to an update of the Federal Bald and Golden Eagle Protection Act permitting process in 2017, no permits were allowed for predictable take of Eastern Golden Eagles.</p> <p>The Eastern population differs from Western birds in many ways, which requires a different approach for surveys, monitoring, and mitigation. The USFWS report<sup>1</sup> indicated that in a study of tagged birds, more than half were killed by human-caused factors (e.g., wind facilities and power line electrocutions). Eastern Golden Eagles "are found in greatest numbers during winter in the north-central Appalachian Mountains of Pennsylvania, West Virginia, and Virginia." This demonstrates the importance of caution when considering permitting actions that harm the species in this key area.</p> <p>A study of eight Eastern Golden Eagles fitted with GPS tags<sup>3</sup> found that these birds migrated and wintered along the Appalachian Mountain range. Migratory birds flew at higher elevations than birds engaged in daily movements on wintering grounds. Further, birds flying over areas of high topographic relief (including ridgetops and steep slopes) flew at lower altitudes. They concluded that "Turbine development on ridgetops and near steep slopes over which eagles fly at lower altitudes should therefore proceed with extreme caution and careful attention to possible mitigation measures."</p> <p>Primary threats to Eastern Golden Eagles include incidental trap mortality and lead poisoning. Collisions with standing infrastructure and electrocutions are key threats to Western populations, and a recent review indicated that "with increasing numbers of industrial-scale wind energy facilities at high elevations in breeding, migratory, and wintering ranges, Golden Eagles in eastern North America will likely face similar threats."<sup>2</sup></p>	<p>In response to ABC's first recommendation, the Project has initiated coordination with USFWS as indicated in the agency correspondence provided to date, and will continue to work with USFWS as needed to ensure compliance with federal laws and regulations.</p> <p>In response to ABC's second recommendation, compensatory mitigation is only required for state listed species under the PBR. In addition, compensatory mitigation is only required when there is a perceived or known impact to a species. In this case, existing data from operating ridgeline wind projects do not support the claim that there will be an impact to golden eagles from the operation of the Rocky Forge Wind project. The recommendation also misrepresents the USFWS information regarding causes of golden eagle fatalities presented in : U.S. Fish and Wildlife Service. 2016. Bald and Golden Eagles: Population demographics and estimation of sustainable take in the United States, 2016 update. Division of Migratory Bird Management, Washington D.C., USA. Table 8 of this publication summarizes cause of death for 97 telemetered eagles. Of these, 43 deaths (44%) of total were anthropogenic in origin; 56% were of natural origin. Among anthropogenic causes, 26% were due to electrocution, 26% were due to shooting, 26% were due to poisoning or lead toxicosis, 16% were due to collision with cars, trains, structures, or wind turbines, and 7% were due to trapping. At the time of the report (2016), the USFWS noted that among the collision-caused fatalities, only 28% were due to wind turbines; 28% of 16% is 4% - therefore only 4% of the known-cause fatalities were due to collision with wind turbines.</p>
103		Intentionally Omitted: duplicate entry	
104	Albert Anderson	<p>Dear Sir, I am in favor of the Rocky Forge Wind Project for the following reasons. I have seen wind turbine installations in other areas. I understand their visual impact. I have also seen the coal mining areas of southwest Virginia. There is no way to produce electricity that does not have some negative impact. Wind turbines could help us reduce carbon emissions. They need to be sited somewhere. In a way they are beautiful visually to me because they represent a step towards preserving our world. The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification. Thank you for your time and consideration. Joseph Anderson Regards, Albert Anderson 990 Whetstone Rd Ferrum, VA 24088</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
105	Center for Advancement of Sustainable Energy	see link	Rocky Forge Wind appreciates your comments and thanks you for your support.

Row ID	Commenter	Summary of Comment	Apex Response
106	American Bird Conservancy 2	<p>A significant alteration has been made to this project by way of substituting taller turbines for the previously-permitted design. A 2013 study, viewed as a primary resource for bird mortality resulting from collisions with wind turbines, found that more birds are killed by taller wind turbines than shorter ones,4 though we note that other studies have reached different conclusions. This is in addition to the aforementioned study of Eastern Golden Eagles, which found that migratory and wintering birds fly at different elevations. In addition to the increased turbine height, the taller turbines now being used have an increased rotor-swept area, making each turbine a greater risk to birds given the limited ridgetop airspace. Collectively, this poses a great deal of uncertainty with regard to the risks posed to birds from the substantial increase in the height of the turbine blades for the Rocky Forge project.</p> <p>The previously-mentioned study of GPS-tracked Golden Eagles addressed specific needs for evaluating risk to birds at wind facilities: "pre- and post-construction surveys conducted at proposed and existing wind sites should focus on documenting flight paths of locally moving individuals as well as the more common practice of counting birds in active migration through or past the site."</p> <p>In considering ways to minimize impacts to Golden Eagles, a study in Pennsylvania indicated that "Preconstruction model assessments can reduce risk if they are used to guide siting of individual high-risk turbines into adjacent yet lower risk areas. Moreover, post-construction mitigation is also possible by shutting down particularly high-risk turbines during periods when eagles occur with highest frequency."5 The issue of curtailment (shutting down high-risk turbines during certain time periods to minimize collision risks) should be considered for Rocky Forge.</p> <p>Lastly, the Virginia Department of Environmental Quality's Wind Permit By Rule Guidance (7/21/17) provides the shelf life of field studies for wildlife to support wind energy facility planning. These indicate that a negative survey, defined as a survey where no State-listed species was found, have a limitation of one to two years, depending on the species. This is further indication that avian studies for the project must be updated.</p> <p>Given the changes to the project plan, avian studies conducted to date are now outdated and likely inaccurate. We urge the State to take the appropriate steps to ensure that the Rocky Forge project adequately evaluates the current risk that this project poses to birds, given significant changes to the project plan and associated changes in likely impacts.</p>	<p>Collision risk is believed to be a function of use, behavior, and rotor swept area. the rotor swept area of the modification will be less than that of the originally permitted project as committed in the updated modification; avian use and behavior are unchanged by the modification. Therefore, the most likely impact of the modification is a reduction in avian collision risk. For golden eagles, specifically, localized flights, such as those of wintering birds occur at lower altitudes, particularly over ridgetops (Katzner et al. 2012). Topography drives migratory flight altitude of golden eagles: implications for on-shore wind energy development. Journal of Applied Ecology 49: 1178-1186) found that golden eagles making local movements (i.e., wintering eagles) moved at lower altitudes over ridges than migratory birds; this suggests that increasing the height of the rotor swept area may reduce risk to wintering golden eagles. Whereas Loss et al. (Loss et al. 2013. Estimates of bird collision mortality at wind facilities in the contiguous United States. Biological Conservation 168: 201-209) found that overall avian mortality increased with taller turbines due to increase rotor swept area per turbine, they did not explicitly evaluate the effect of overall reduction in rotor swept area that is achieved when larger turbines are used to generate a fixed amount of energy; in the case of Rocky Forge, the proposed increase in turbine height and commitment to reduction in swept area. With the reduction in rotor swept area and reduction in ground disturbance reflected in the PBR modification, the most likely impact to golden eagles is a reduction in risk compared to the already permitting project design. With respect to Recommendation 2, risk of collision to golden eagles may be related to use; however, numerous studies at wind energy facilities find that eagle use alone is not an accurate predictor of collision risk. To that end, studies are ongoing to understand factors that interact with use to influence risk of collision. Until such studies are completed, the potential use of curtailment as eagle avoidance cannot be assessed for efficacy.</p>
107	Eric Claunch 1	<p>Dear Mr. Johnson, Apex has cleverly deceived Botetourt County's Board of Supervisors and its citizens in thinking that Rocky Forge Wind is environmentally beneficial and will produce electricity to power up to 21,000 homes. It will NOT. The actual wind data for North Mountain from the multiple MET towers that have been there for many years has never been provided to the county or to private citizens who have requested it--only a very superficial summary--making one seriously doubt whether the wind is truly adequate for generating electricity here.</p>	<p>Please see responses 67 and 74.</p>
108	Eric Claunch 2	<p>The necessary road easements have not been obtained to transport the turbines to the mountain. Mr. Johnson, you purposely intended to deceive the Botetourt County Board of Supervisors when you told them you had "verbal agreement from the largest landowner" just to get them to approve your change requests. Two months after you said this, there is still no signed/written agreement with the largest landowner and with a smaller landowner as well (who you intentionally failed to mention). [REDACTED SENTENCE: Personal attack.]</p>	<p>Rocky Forge Wind disagrees with claims in this comment. Private land rights for a VDOT road improvement project are not a part of the Permit By Rule Modification Application.</p>
109	Eric Claunch 3	<p>The failure of Apex, at this very late date, to document what make and model of wind turbine has been selected for Rocky Forge is quite telling; it appears Apex intends to give the county a "bait and switch", providing a wind turbine whose noise and safety specifications are unknown and untested. The infrasound noise level from wind turbines proposed for North Mountain has never been published. In fact, you publicly scoffed that infrasound noise generated by wind turbines is a documented issue. Measurements of infrasound noise from 680' wind turbines has never been documented publicly. This noise is fully expected to cause adverse health issues to both humans and wildlife. And the infrasound noise effects to pollinating insects have never been considered.</p>	<p>Rocky Forge Wind will use certified technology at the project site. Though the final turbines have not been chosen, all studies at the local level have incorporated the maximum case for any turbine, and Rocky Forge Wind will adhere to all applicable regulations.</p>
110	Eric Claunch 4	<p>Further disturbing the land on the mountain will cause watershed problems to Mill Creek, Rocky Creek, and Sinking Creek, and will cause the invasive Japanese Stiltgrass to take over all disturbed soil.</p>	<p>As indicated in the modification application, the revisions to the project footprint being requested will allow the project to eliminate approximately 51.92 acres of impacts, thereby reducing overall land disturbance required to build the project below what was originally permitted under Registration No. 2017-W01.</p> <p>Please also refer to response 80.</p>
111	Eric Claunch 5	<p>The turbines blades will kill countless birds and bats. Mr. Johnson, I look forward to a response that provides clear, concise, direct and scientifically supported rebuttal to all of the environmentally damaging issues included above. Regards, Eric Claunch 2817 Mt Moriah Rd Eagle Rock, VA 24085</p>	<p>It is possible that avian mortality rates per turbine will increase with increased turbine height; however, the total rotor swept area for the entire project will be reduced with fewer turbines, thereby reducing avian mortality for the Project. Additionally, literature regarding the effect of increased turbine height on avian and bat mortality rates is equivocal, with some studies concluding it increases mortality rates an others concluding id decreases mortality rates</p>

Row ID	Commenter	Summary of Comment	Apex Response
112	Sherry Crumley	<p>To Whom It May Concern,</p> <p>My husband and I are residents of northern Botetourt county, we have put our 400 acres of land into a conservation easement. I am currently serving my 14th year on the board of the National Wild Turkey Federation. I served eight years on the board of the Virginia Department of Game and Inland Fisheries (Department of Wildlife Resources), including a term as chairman. I am a conservationist. We are very familiar with the proposed wind farm and the property on which it will be located. The Fraley family are conservationists and would do nothing that would harm the land or the wildlife on their land. This is a rural land tract encompassing more than 9000 acres and in my opinion is the right place for a wind farm. It will have very little negative impact on the land or on surrounding residents. I have participated in many of the public hearings and it has been interesting to learn that most of those who object to this project do not even live in Botetourt county. This project has gotten overwhelming support from local residents from the beginning. Our local officials support the project. In my opinion a wind farm has the least amount of environmental consequence of any energy source. Please approve this project.</p> <p>Sherry Smith Crumley 2917 Trebark Road Buchanan, VA 24066</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
113	Grace Harwin	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Grace Harwin 205 Morning Dove Ln Blue Ridge, VA 24064</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.
114	Melissa Hundley 5	<p>Dear Mr. Johnson,</p> <p>I strongly disagree with putting giant wind turbines on top of a mountain in Virginia. Virginia, has no building this tall so why would you put 22 enormous industrial wind turbines on a mountain of all places? I will quote Chairman and Chief Strategy Officer of Apex Clean Energy in a now-defunct Charlottesville publication The Hook:</p> <p>"In a 2002 interview, Reisky revealed that his company typically would approach Midwestern ranchers and sign 40-year leases for the rights to place turbines on the land. Far from the critical slopes, delicate fauna, and crusading activists of scenic Appalachian areas, Reisky and Hantzmon said they encountered few political storms in the heartland"</p> <p>Regards, Melissa Hundley 422 E Ridgeway St Clifton Forge, VA 24422</p>	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines, while reducing the number of turbines and reducing disturbance to the site.
115	Edwin McCoy	<p>Dear Mr. Johnson,</p> <p>I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.</p> <p>Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.</p> <p>The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.</p> <p>Thank you for your time and consideration.</p> <p>Regards, Edwin McCoy 489 Back Creek Ln Buchanan, VA 24066</p>	Rocky Forge Wind appreciates your comments and thanks you for your support.

Row ID	Commenter	Summary of Comment	Apex Response
116	Ruth Johnson	To whom it may concern, This correspondence is to share my support for the Rocky Forge Wind project Permit By Rule Modification. As a Roanoke Valley resident, I can't think of a more exciting project to be hosting than the first onshore wind project in the Commonwealth. Rocky Forge has been sited responsibly, and will be a source of pride for SW Virginia in the future. Utilizing fewer, but larger turbines represents how the industry is trending and should be allowed as the newest technology is safer and more efficient. Please approve this application. Ruth Johnson Salem, VA	Rocky Forge Wind appreciates your comments and thanks you for your support.
117	Jonathan Miles	Dear Mr. Johnson, I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community. Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site. The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification. Thank you for your time and consideration. Regards, Jonathan Miles 6905 Harvest Farms Ln Crozet, VA 22932	Rocky Forge Wind appreciates your comments and thanks you for your support.
118	Molly Petty 1	Now Apex is back and contends in its barely-altered PBR on environmental risks that the corporation was not required to consider the question of how much more risky taller turbines are to birds and bats. Apex offers no new data, no new studies, no update from studies conducted over 5 years ago, no discussion of mitigation through flight diverters, curtailment, or other proven new tech developments in the wind industry, and no inkling that they will abide by new USFWS guidelines under the two federal acts that protect species in danger of extinction or participate in the Service's Eagle Plan and Incidental Take program, in spite of the fact that since Apex's original permit, USFWS new guidelines clearly want all wind installations, regardless of size and low risk assessment, to apply for a take permit. What does the very real possibility of extinction of golden eagles mean to Apex?	Collision risk is believed to be a function of use, behavior, and rotor swept area, the rotor swept area of the modification will be less than that of the originally permitted project as committed in the updated modification; avian use and behavior are unchanged by the modification. Therefore, the most likely impact of the modification is a reduction in avian collision risk. For golden eagles, specifically, localized flights, such as those of wintering birds occur at lower altitudes, particularly over ridgetops (Katzner et al. 2012). Topography drives migratory flight altitude of golden eagles: implications for on-shore wind energy development. Journal of Applied Ecology 49: 1178-1186.). This suggests that increasing the height of the turbines will further reduce risk for this species. Golden eagles are not at risk of extinction; they are neither listed as federally threatened or endangered. The intent of the USFWS incidental take permit process for eagles is to provide permits on a voluntary basis to projects that the owners believe have a substantial risk of eagle take. If eagle take appears to be likely, then an owner may apply for a permit, but the USFWS does not recommend or require that all wind projects obtain such a permit.
119	Molly Petty 2	Apex is basically saying in its PBR that they will do the barest minimum required, no more (and less if they can get away with it) to ensure their taller turbines are found compliant with state and federal regulations—and approved in short order. They will check off boxes on a PBR list, even leave whole sections blank or with minimal specifics. They make no attempt to update or justify their inattention and inaction on some of the most controversial aspects of Rocky Forge. They certainly do not make it easy for the public to understand or find related information through links to their outdated avian surveys.	Rocky Forge Wind appreciates your participation. This public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
120	Molly Petty 3	The most egregious omission in Apex's modified PBR is the absence of any evidence that Apex, since 2016 when it applied for its original permit, has bothered to familiarize themselves with new US Fish and Wildlife guidelines on the Eastern Golden Eagle, or any wind industry professional literature on reducing and mitigating bird and bat kills at turbine installations; or conducted follow-up field studies that reflect changes in turbine height and siting; or acquainted itself with a plethora of industry-approved and tested tech solutions like curtailment that have been introduced and marketed since 2016.  Antares, hired by Botetourt County to review the Apex's SEP modifications to the RF project, reported in its "Review of Updated Concept Plan" that the taller turbines Apex requested represent "an increase of 130 feet (40 meters) over the originally permitted height of 550 feet (168 meters), which is a significant change to the original application."  Why are the environmental and wildlife ramifications of that significant change not addressed in the new modified PBR? Turbine height in aspects other than bat and bird kills are given attention in the PBR. And, according to emails between Apex and Department of Game and Inland Fisheries (DGIF, since July 1 renamed Department of Wildlife Resources, DWR) collected via FOIA, there was discussion of the need for avian studies from DEQ.	Please refer to responses 60 and 118.  Discussions with VDGFIF pertaining to the "need for avian studies" as referenced in the comment pertained to a separate area that was under consideration in 2019 for a potential access road. That road is not included in the current PBR modification request and previously authorized access will now be used. Furthermore, all eagle-related studies conducted for the Project were representative of the Project area spatially and temporally and sufficient for the purpose of evaluating risk to the species.
121	Molly Petty 4	In their pre-SEP and ordinance modification report, Antares also states: "If the heights of the proposed structures change, or if the structure's location changes in any direction, the application for that structure would need to be resubmitted." The locations of some structures did change, as did the height of turbines. When those changed, so did the amount of blasting Apex will do, the depth of the concrete, the size of the hub, and all manner of both construction and materials, some toxic, that will be employed at each turbine site.	Although there will be fewer of them, the locations for the turbines have remained within the disturbance area on the ridge line. The referenced report was created in response to a land use case before Botetourt County for approval, rather than for the PBR modification application. Also, the quoted language from the report is with regard to the approval process for wind turbines with the Federal Aviation Administration. However, because turbine heights have changed, Rocky Forge Wind is submitting a PBR modification application to DEQ. Though it is too early to know how much blasting will be required, Apex will follow all applicable laws with regard to this process.

Row ID	Commenter	Summary of Comment	Apex Response
122	Molly Petty 5	<p>The Department of Game and Inland Fisheries on May 24, 2019 sent Jennie Geiger, Apex Energy staff, the following guidance about one possible change, access road location, giving specifics even though Apex had not secured access road construction permission or filed erosion, sedimentation, or stormwater run-off plans to Botetourt County.</p> <p>"Your request for guidance emphasized potential avian surveys. If the decision is made to submit a permit modification to include review of the 'area of consideration for the access road' ('area of consideration'), we recommend that similar surveys as performed in 2015 and 2016 be conducted along the length and width of the 'area of consideration'. These should include point count surveys repeated &gt;once per season, as well as specialized surveys for the following species...</p> <p>Having prepared the original PBR application and supporting surveys for this project, you are familiar with the scope and level of detail required to evaluate the original footprint. Please note that the same scope and level of detailed information would be required for any new area added to the original footprint. Evaluation of any new area would need to address potential impacts to Threatened and Endangered (T&amp;E) species, Tiered species listed under the Wildlife Action Plan, bats, and avian resources.</p> <p>We recommend continued coordination with us as you evaluate the potential addition of this new access road on new location."</p> <p>If I am reading the PBR correctly, there will not be a new area of consideration for the access road entry? Is a permit and new study not needed for 18.07 acres of "Additional corridors, areas of potential disturbance?"</p>	<p>The area under consideration in spring 2019 for a potential access road was determined to be unfeasible for the project for a variety of reasons. As is evident in the correspondence with VDGIF, the area under consideration in 2019 is entirely outside of the proposed disturbance footprint as outlined in the current modification application and is irrelevant to this PBR modification request.</p> <p>In reference to the need for surveys, the area under consideration in 2019 for which VDGIF recommended surveys was comprised of a large area of forested habitat where no surveys had been previously completed. The 18.07 acres being requested in this modification is spread throughout the previously permitted disturbance footprint, the impacts are largely aligned with existing roads and disturbed areas, and almost all of the majority of the deviations from the permitted footprint were covered by previously completed surveys for the project.</p>
123	Molly Petty 6	<p>The PBR JPA from 2016 told us that streams crossed by access roads will be widened and rerouted to accommodate larger equipment and turbine blades will be trench crossed. What update to access road construction and environmental risk is available to the public? Apex has not submitted to the county an Erosion and Sedimentation and Stormwater plan for the permanent crossings of streams, thousands of square feet of wetlands, or specifically addressed "the impact to USACE-regulated streams and wetlands," an impact the Timmons Group admits in their report for the PBR is "inevitable." The impacts are to streams and tributaries in the James River watershed, but not much more than that is delineated in Timmons' "preliminary" wetland study. Will the project comply with NWP 12? I would like to see more information in the PBR about 9 VAC 15.40-30. A.1, specifically iv: waterbodies, waterway, wetlands, and drainage channels.</p>	<p>There are no additional wetlands or stream crossings related to the proposed modifications.</p>
124	Molly Petty 7	<p>Apex did "additional desktop review to understand any species status change since 2017 in the DGIF" (Attachment 7A [1]). Is a desktop review sufficient? What did Apex come to understand about species status beyond whether a species was on a list or not? If I had not requested a FOIA about wildlife surveys, I would not know anything in addition to outdated avian studies from 2014 and 5 years prior to the present. This is because Apex approaches this PBR requirement primarily by checking off lists and assuring us that "DGIF has indicated that no additional breeding bird surveys are required for Modifications." Why not let the public in on how DGIF came to this conclusion? The PBR states, "The Modifications represented in this application do not change the results of this analysis." Why not? Would a 6-year-old analysis be valid for all time, all modifications? Only a FOIA revealed in part the method DGIF used to reach their conclusions. Apex did not respond in a timely manner to discuss by phone the rationale for not updating studies.</p> <p>In addressing raptor migration surveys, Apex's shoddy reasoning is exposed in stark terms. Apex states "Since the original data was collected for all raptors migrating through the area regardless of flight height, the information provided in the original report is sufficient to address the Modifications requested in this application and do not change the results of this analysis." First, the flight height, or whether or not one of the 8 golden eagles spotted within the project site on North Mountain was flying within the rotor swept area, was indeed noted (some of the golden eagles were flying within swept areas, some above; all but one were in the project area.) By not conducting flight and raptor migration studies based upon the 680 ft. tall turbines as was done for original PBR, how can Apex know that birds, or bats, for that matter, are still at the "low risk" for mortality?</p> <p>Recent professional research would alert Apex to their faulty reasoning: "Radar studies indicate that 90% of avian nocturnal migrants fly above the height of the current rotor-swept zone of turbines (140 m; 460 feet) in most operating wind energy facilities. Land-based wind turbines have been developed that extend almost twice the height of existing turbines reaching higher into the space used by nocturnal migrants, and there are concerns that this will increase bird collisions." (Allison, Issues in Ecology, 2019, <a href="https://www.esa.org/wp-content/uploads/2019/">https://www.esa.org/wp-content/uploads/2019/.</a>)</p>	<p>Per Allison et al. (Issues in Ecology, 2019), "Since 2016 more than 5,000 turbines have been installed in the U.S. with a combined height of more than 500 feet. Relative to earlier models, the number of blade revolutions per minute has decreased from 60 to 80 rpm to 11 to 20 rpm." As the size of turbines increases, the spacing between turbines increases and the total number of turbines deployed as a wind project decreases. At the Rocky Forge Wind Project, the modification to taller turbines will result in a reduction of rotor swept area as clarified and updated in the modification application, which supports reliance on the existing data that are fully representative of the Project spatially and temporally. Allison et al. (2019) additionally note, "The few published studies have been contradictory in their findings regarding the effects of increased turbine height or increased MW capacity on fatality rates of birds. For raptors, however, repowering at Altamont Pass, where smaller turbines have been replaced by fewer, taller turbines, may decrease fatalities in this group."</p>

Row ID	Commenter	Summary of Comment	Apex Response
125	Molly Petty 8	<p>"When plans changed in Spring 2019 to add a new access road on new location not included for review in the original PBR application, DEQ considered that plan change a modification to the original PBR. Additional (DGIF) review was required. That's understandable. 'just wondering if this plan to change turbine height would similarly impact the validity of the existing PBR or the project, require additional agency review, or suggest the applicant needs to provide further analysis of potential impact that could result from larger turbines? Thoughts?"</p> <p>n a series of emails answering the question of whether taller turbines pose more risk to golden eagles, most staff were to the point and blunt:  -----On November 22, 2019, one staff member wrote "Definitely Golden Eagles are potentially in the rotor sweep. More so in the winter months when their paths are very close to ridge lines."  --On December 9, 2019, a second staff member responded, "Just coming up to speed on these issues. In recent lit, ~55% of unadjusted bird fatalities at eastern wind facilities were small passerines, and there are peaks in fatalities in this group during spring and especially fall migration. Radar studies show that 90% of avian nocturnal migrants fly above the height of the current rotor-swept zone of turbines (460 feet), but birds adjust their flight altitude to make optimal use of tail winds along the predominant migratory direction, so whether they fly low or high can vary from night to night during migration. In addition to migration, small passerine collisions with turbines occur throughout the year (ex. on the breeding and wintering grounds). There is no consensus among the few published studies on increased turbine height on fatality rates of birds. So more data needed, but there is at least the potential for greater impacts due to taller turbines.  --On January 13, 2020, a fourth DGIF staff member wrote, "Yeah, [turbine height] definitely increases the risk. At a minimum, it is important to remember that it isn't just the height that is changing, but also the rotor-swept zone is becoming bigger. Thus, a larger part of the airspace is taken up by blades."</p>	As noted in the correspondence quoted by the comment, there is no consensus among studies regarding the impact of increased turbine height on avian and bat mortality rates. It is likely, though not proven, that an increase in rotor swept area will increase mortality. The modification to the Rocky Forge Wind Project will result in a net reduction of rotor swept area as clarified and updated in the modification application; further reducing the risk of avian and bat mortality.
126	Molly Petty 9	<p>DEQ, too, seemed to think DGIF could ask for mitigation measures: on May 23, 2019 in an email to Jennie Geiger, Apex Clean Energy, the DEQ Renewable Energy Permitting staff wrote:</p> <p>I have been in contact with Ernie at DGIF regarding the proposed changes to the Rocky Forge project. As I explained to Ernie, the applicant will need to supply additional information for a permit modification as well as the permit modification fee. This would include additional desktop studies and any additional evaluations/studies/reports deemed appropriate and required by DGIF."</p> <p>Everyone seems to be concerned, yet there are two lines in Apex's PBR Modification application about consulting with DGIF, roughly saying, "we consulted; we don't need to update bird studies."</p>	Please refer to response 118.
127	Molly Petty 10	<p>The bare-bones statements regarding environmental impact in Apex's PBR application are, unfortunately, typical of Apex's disregard of concerns about increased bird and bat mortality because of increased turbine height (680 feet) and greater rotor swept area. First, Western Ecosystems, Inc. (or WEST's) field studies of avian use, bird breeding habitat, and other studies are outdated and, because of changes to turbine height, inaccurate.</p> <p>WEST used 2007 US Forest Service national Bald Eagle Management Guidelines for their assessments. One WEST avian survey report references a grand total of 2 sources, 12 year old guidelines and a 6 year old bald eagle nest data website that clearly states that the website data does not cover the mountains of Virginia. The data was from coastal and central Virginia, not our region at all. This is the level of research upon which Apex bases its environmental report: outdated, bare-bones, and produced by an outfit, WEST, that around the same time they were conducting field studies for Apex, were found to have falsified information about bald eagles in documents about another wind project, Galloo Island:  <a href="http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7B013A0493-7407-4D5A-A304-C473CCC2B38C%7D">http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7B013A0493-7407-4D5A-A304-C473CCC2B38C%7D</a> and <a href="http://www.oswegocountynewsnow.com/news/developer-pulls-application-for-galloo-island-wind-project/article_30b6a344-377d-11e9-93f6-d7b1aa534dce.html">http://www.oswegocountynewsnow.com/news/developer-pulls-application-for-galloo-island-wind-project/article_30b6a344-377d-11e9-93f6-d7b1aa534dce.html</a>  It was a mystery to me why Apex did not take wind swept height of taller turbines into consideration. Why was there nothing at all in the modified PBR about this?</p>	Please refer to response 118.
128	Molly Petty 11	<p>There are proven sightings of golden eagles on North Mountain in the project area. Where in the Modified PBR does Apex commit to conforming to USFWS guidelines, to bumping up its wildlife protections, to even considering all the new tech solutions to preventing bird mortality at turbine sites? Apex surely knows of these wind industry-tested solutions for reducing bird mortality and injury, yet there is no mention in any of their application documents that they have considered adopting preventative or mitigation strategies.</p>	The presence of golden eagles has been recorded during surveys for the Project; however, the Project modifications that are the subject of the PBR modification application do not alter the assessment of risk to the species. Whereas there are some technological approaches to risk reduction undergoing testing within the wind industry; none of these are yet proven effective. Furthermore, technological solutions are deployed only when actual impacts are high and cannot be reduced by other means.
129	Molly Petty 12	<p>Apex's conclusions contradict the above (and ABC bird migratory route maps): "Flight path data for the eagles documented in these surveys demonstrate no obvious flyways or concentration areas; therefore, siting turbines to avoid higher risk areas is not warranted." Like so much else, Apex really offers no evidence to support its conclusions at this time, during this PBR, or under these changed circumstances.</p> <p>In Rocky Forge we do not have a wind energy installation that is cited properly and developed by professionals within industry best practices, or a PBR based upon studies and field surveys conducted by reputable and unbiased, unaffiliated with Apex, biologists. It is a project that in its PBR rejects rigorous regulatory or public scrutiny and voluntary compliance with well-established guidelines. In not opting for an USFWS incidental take permit that would require Apex to release public data about bird and bat corpse collection in the future should Rocky Forge begin operating, Apex is rejecting mitigation, public transparency, and the best chance the USFWS has to prevent extinction of the eastern golden eagle.</p>	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines.

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130	Jon Scarborough	Dear Mr. Johnson, Interesting how the form auto-populates with APEX BS. Which property owners are receiving benefits? Fraley is the only one and maybe some easements that APEX paid peanuts on. The tax subsidies is what the investors are after. They certainly dont care about the citizens of the county, they only care about the subsidies and a return on their investment. Gov [REDACTED: Racial slur] is RAISING everyones utility taxes to pay for this. Electric bills will go UP for all, prove me wrong. [REDACTED SENTENCE: Personal attack]. Regards, Jon Scarborough 532 Locust Bottom Rd Eagle Rock, VA 24085	Rocky Forge Wind appreciates your participation, but this public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
131	Virginia Sierra Club	see link	Rocky Forge Wind appreciates your comments and thanks you for your support.
132	Sandra Stuart 1	This project started with 550 foot turbines and it has now been increased to a 680 foot model, which has yet to be installed anywhere, even on flat ground. One 500-foot, steel wind turbine requires anchoring in a platform of more than a thousand tons of concrete and steel rebar, 30 to 100 feet across and anywhere from 6 to 30 feet deep. Mountain tops must be blasted to create a level area of at least 3 acres for each turbine. Rocky Forge will build up to 22 wind turbines 680 feet high.	See Response 133.
133	Sandra Stuart 2	Bigger blades on a taller tower can capture more wind to run a bigger generator, but they require a correspondingly larger foundation and an area around them clear of trees and other turbines to maximize the effect of the wind and avoid interference.	Strength of the foundation does increase with the size of the turbine, however it has not been determined the exact type of foundation to be used. There are different types that require less concrete than the traditional spread footer foundation. All options for this will fit within the studied disturbance corridor. Though some blasting may be required, the goal is to keep the turbines at the highest altitude possible of the existing terrain. Typically, turbines can be erected on under 1 acre, all of which does not need to be completely level.
134	Sandra Stuart 3	In addition to mountain top removal that will occur from the installation of these turbines, the many mountain streams and wetlands and the life they support will be demolished and the resulting erosion and sediment from stormwater will be deposited in the James River. Since this is a known karst-riddled area, the blasting required will disturb far more than the 2 miles the company has been asked to research beyond the project and will likely affect the reservoir close to the Rockbridge and Botetourt county line.	Please see responses 97 and 100.
135	Sandra Stuart 4	After water, concrete is the most widely used substance on earth. If cement were a country, it would be the third largest emitter of carbon dioxide in the world – 2.8 billion tons/year – surpassed only by China and the US. In production, it also sucks up almost one-tenth of the world's industrial water use, all the while destroying the natural infrastructure and ecological function that humanity depends on for providing soil fertilization, flood control, water purification, and habitat biodiversity. Wind turbines can play an important part in our transition from gas and oil; however, Rocky Forge is not appropriate environmentally for North Mountain and is not cost effective from any other aspect of the project from construction, transportation, installation, production, decommissioning, to recovery. Mitigation for the problems this project faces is not even close to an even trade and cannot replace the destruction of a healthy forest already sequestering carbon.	Rocky Forge Wind appreciates your participation, but this public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
136	Barbara Walsh 1	As previously noted, the proposed Rocky Forge power station site is in the area that has already been identified by the Virginia Outdoors Foundation (VOF), Valley Conservation Council (VCC), and Rockbridge Area Conservation Council (RACC) as the last, least developed, largely intact forested landscape in Virginia providing a functioning connection for wildlife between the Alleghany Highlands and the Blue Ridge Mountains.  Many of the natural resource concerns originally expressed in the 6/6/16 comment letter from Lee Merrill to APEX submitted previously by RACC and included here by reference, also require re-evaluation of the proposed new design, construction, and operational parameters proposed for Rocky Forge.  Since the review of the original PBR, the State has added the Arcadia Initiative, a multi-jurisdictional effort to preserve this critical large landscape to the 2018 Virginia Outdoors Plan (page 13.35) for the protection of wildlife migration and forest ecology with compatible economic development such as outdoor recreation (details from RACC attached).  Virginia has also established and developed a plan for the new Natural Bridge State Park within the Arcadia Initiative region, which shares the natural resources and project impacts on those resources as well as park goals for night sky accreditation. The increasing importance of this last inter-ridge connecting ecosystem conflicts with industrial scale development. There are alternative locations and scales of wind energy production available in Virginia that do not conflict with the State-recognized value of preserving this critical landscape."	The wind project has already been permitted at this location. This modification request is specific to minor changes in ground disturbance and an increase in the height of the turbines. The Visual Impact Report has been updated and makes it clear that the change to the surrounding areas based on the taller turbines is negligible.  VOF's identification of this area does not carry any specific regulatory protection. The designation is used to promote conservation by private landowners. The Rocky Forge Wind project is located on private land and the sensitive species regulated by the state have been considered through adherence to the PBR regulations.
137	Barbara Walsh 2	I concur with and add my support for the comments submitted separately by the Rockbridge Bird Club and American Bird Conservancy (ABC) reflecting the most knowledgeable expertise on local bird populations in this area that is "underbirded" and appears as a blank area on the State's published map of bird occurrence including nocturnal and migrant species since it has not yet received comprehensive study by Audubon or the applicant. The ABC has furthermore identified the area as a Globally Important Bird Area precisely in the concentrated migration and nesting location of the small and potentially vulnerable population of the Eastern Golden Eagle, a species that is strictly protected by 3 Federal Acts and Treaties requiring full study of impacts due to increased turbine heights, tip speeds, and total swept area and compliance with the Bald and Golden Eagle Protection Act.	The project is not located in a globally important bird area, which is a designation provided by Audubon and BirdLife International (not ABC). Golden eagles do not breed in Virginia, or anywhere else in the eastern U.S.; eastern golden eagles breed in Canada and winter in the eastern U.S. Studies completed to date were spatially and temporally representative of the project. The project is currently, and will remain, in compliance with the Bald and Golden Eagle Protection Act as required by federal law.
138	Barbara Walsh 3	By definition, the Rocky Forge power plant ridge-top location is in the headwaters of important and high-quality water resources and habitats. As has been so clearly demonstrated by the nearby Mountain Valley and Atlantic Coast Pipeline projects during the time since the first Rocky Forge PBR review, the available best management practices for controlling runoff, erosion, sedimentation, and other water quality impacts are not adequately protective on the extremely steep slopes, thin soils, and geological conditions found in the mountainous terrain of the Alleghenies and Blue Ridge. Neither the impacts, mitigation, or compliance monitoring and sampling for these "lessons learned" is adequately addressed for construction and operation at Rocky Forge and effects on surrounding receptors.	Please see response 97 and 100.

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139	Barbara Walsh 4	As noted by others, the National Renewable Energy Lab data indicates that the Rocky Forge site offers marginal wind levels, and ridge top sites in Virginia in general have less productive wind resources than are found offshore. We cannot waste the precious capital available to meet Virginia's renewable energy goals on full scale build out of projects that don't contribute significantly to the power production needed by 2050, while at the same time using up the State's review, compliance monitoring and enforcement resources.	Please refer to responses 67 and 74.
140	Neil Treger 1	Please note that I am sending this e-mail in opposition to the Rocky Forge Wind project. This project makes little sense: 1. It will cause significant environmental damage during construction, and severely adversely impact the surrounding rural area;	Rocky Forge Wind appreciates your participation, but this public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
141	Neil Treger 2	2. The electricity generated is not as high as the projections from Amex forecast, given that the turbines will be turned off at night and the area simply does not generate as much wind as is assumed. Their projections are faulty;	Turbines will not be turned off at night except during certain times of year when wind speeds are below 6.9 m/s and temperatures are above 38 F to avoid risk to listed bats as outlined in the application.
142	Neil Treger 3	3. While they claim that their footprint is reduced with taller structures, the aerial footprint is actually significantly larger;	Please refer to response 68.
143	Neil Treger 4	4. This project affects Rockbridge County, yet is being approved by a neighboring county that will actually have little impact or much less impact from the project;	Rocky Forge Wind appreciates your participation, but this public comment report is reserved for comments relating only to the application for modification of the currently authorized Permit By Rule (Registration No. 2017-W01).
144	Neil Treger 5	5. The equipment itself must be certified per an executive order restricting the use of equipment from certain countries, yet Apex does not include or disclose where this equipment would come from and thus the project may be in violation of a federal executive order;	Please see response 148.
145	Neil Treger 6	6. Wildlife studies are not up-to-date, with the most recent one being completed in 2016 and the firm that was used for the study has a record of falsifying information, as was done for the Galloo project in New York, with the project later dropped;	The PBR guidelines recommend that surveys for state-listed species with the potential to occur in the Project area be refreshed every 1-2 years if the species was confirmed absent from the area previously. These are guidelines only and DGIF has indicated that no additional avian surveys are required for the proposed modifications. Golden eagles are not state listed, and the project has documented presence for peregrine falcon and bald eagle (although this species has been downlisted since the 2017 PBR guidelines), therefore this recommendation would not apply. Although loggerhead shrikes have not been identified on the Project site, the proposed modifications are located primarily in areas that do not provide loggerhead shrike habitat. One area of low probability shrike habitat is located within the modification area, but impacts to that area have been minimized. In addition, tree clearing on the site is limited during June and July of the breeding season. Existing breeding bird survey data provide spatial coverage representative of all Project areas and have sampled all but 2.3 acres of the proposed additional areas. There is no scientific basis to the assertion that additional breeding bird surveys are needed to assess potential impacts.
146	Neil Treger 7	7. Public discussion has been limited in time and scope. Simply put, the corporate interests backing this project are ignoring local public opposition and limiting their input. Again, this project makes no sense. Neil Treger	Rocky Forge Wind has provided ample opportunity for public comment on the modification. The modification was made available on the project's website, where comments could be made directly to the contents. Comments could also be sent in by mail, email, phone message or live on the public meeting for the modification.  Please also see response 92.
147	Jeff Scott 1	According to the Code of Virginia Title 56 (Public Service Companies) Chapter 23 (Virginia Electric Utility Regulation Act) in Definitions 56-576: "Electric utility" means any person that generates, transmits, or distributes electric energy for use by retail customers in the Commonwealth, including any investor-owned electric utility, cooperative electric utility, or electric utility owned or operated by a municipality. Since Rocky Forge will be generating electricity that will be sold to Dominion and Virginia, Apex, by definition, must be an electric utility. This certification is invalid and therefore this application is not complete.	Under this statute, Rocky Forge Wind is not an Electric Utility, as it is selling the power on the wholesale market, not to a retail customer.
148	Jeff Scott 2	The following statement is made: Ultimately, Rocky Forge Wind will use wind turbines that are suited for the area, provide long-term functionality, and are manufactured by companies that have a proven track record in wind turbine production. But, without knowing the make and model of the turbines it is not possible to determine if the project complies with Executive Order 13920 issued May 1, 2020. In part, this order requires the Department of Energy (DOE) to create and implement new rules that will govern the procurement, importation, transfer and installation of bulk-power system (BPS) equipment in which a "foreign adversary" is determined to have an interest. Foreign adversaries have currently been defined to be China, Russia, Iran, North Korea, Cuba, and Venezuela. Since turbines incorporate many mechanical, electronic and computer components (many of which be manufactured in China), as well as computer software, without knowing the make and model of turbine is it impossible to determine if the turbines to be used at Rocky Forge comply with EO 13920. Without certification from the Department of Energy that the turbines are in compliance, this application is not complete.	Rocky Forge Wind will have to comply with all laws with regard to purchasing of equipment and facilities for the project. These referenced regulations are federal and, as such, will be taken into account.
149	Jeff Scott 3	In the original application in the document "Attachment 7A(4) General Avian Use and Raptor Migration Survey" on physical page 12 in the section "Bird Flight Height and Behavior" is the following statement: Flight height information was used to calculate the percentage of birds observed flying within the rotor-swept height (RSH; estimated to be between 25 and 150 m [82 to 492 feet] above ground level [AGL]) for modern utility-scale turbines. The flight height recorded during the initial observation was used to calculate the percentage of birds flying within the RSH and mean flight height. The percentage of birds flying within the RSH at any time was calculated using the lowest and highest flight heights recorded. Since the modified application is for turbine heights of 680' this study is obsolete and the application is not complete.	For all groups of birds observed during fixed-point bird use surveys at the project, 100% of observations were at or below the rotor-swept height of the originally proposed turbines; no flights occurred above 150 meters (492 feet). Reanalysis of the data would lead to the conclusion that increasing turbine height has reduced risk of avian collisions; however the research literature regarding the impact of turbine height on fatality rates is equivocal.  Although the proportion of birds occurring in proposed rotor swept heights is routinely reported as an estimate of potential risk exposure at wind projects, it has not been found to be predictive of actual collision mortality rates; therefore, any new analysis will not improve risk prediction for the modification

Row ID	Commenter	Summary of Comment	Apex Response
150	Jeff Scott 4	Using the EPA AVERT model, the claim is made that Rocky Forge will offset 185,870 tons of carbon dioxide. But does this model take into account the CO2 emitted during the manufacturing and construction of the turbines? For example, the making of concrete is one of the worst generators of CO2 that there is. The Green Ration Book chapter on the "Carbon Footprint of Concrete" ( <a href="http://www.greenrationbook.org.uk/resources/footprints-concrete/">http://www.greenrationbook.org.uk/resources/footprints-concrete/</a> ) states that "The manufacture of cement produces about 0.9 pounds of CO2 for every pound of cement. Since cement is only a fraction of the constituents in concrete, manufacturing a cubic yard of concrete (about 3900 lbs) is responsible for emitting about 400 lbs of CO2." Based on the size of the proposed turbines (680 ft), I will use an estimate of 1000 cu. Yd. of concrete for each foundation. Therefore each turbine foundation will result in 400,000 pounds of CO2 emissions, or 200 tons. Multiply that by 22 foundations and you get 4,400 tons of CO2. And that is just one component of the CO2 cost of manufacturing and construction. What are the other manufacturing and construction components contributing? Without this information the analysis is incomplete and therefore this application is incomplete.	The EPA Avert tool takes into account the anticipated emissions saved based on production at the project site, rather than the production of the equipment as well. According to a paper published in the International Journal of Sustainable Manufacturing, a lifecycle assessment of 2 MW wind turbines concluded that in terms of cumulative energy payback, or the time to produce the amount of energy required of production and installation, a wind turbine with a working life of 20 years will offer a net benefit within five to eight months of being brought online. <a href="https://www.sciencedaily.com/releases/2014/06/140616093317.htm">https://www.sciencedaily.com/releases/2014/06/140616093317.htm</a>
151	Jeff Scott 5	Electricity produced by Rocky Forge will be a negligible amount compared to the total that Virginia uses. According to statistics compiled by the Institute for Policy and Social Research at the University of Kansas, in 2017 Virginia used 111.5 TWH of electricity. The PBR Modification submitted by Apex states that Rocky Forge will not exceed 100 MW. So what impact will this have on Virginia's demand for fossil and nuclear fuels? Negligible. A terawatt is 1000 gigawatts. A gigawatt is 1000 megawatts. To make the calculation simple, let's say Virginia uses 100 TWH. This is equal to 100,000,000 MWH. This means that if Rocky Forge is producing its maximum electricity 100% of the time it will provide 100 MW * 24hr/day * 365 days/yr = 876,000 MWH annually. Therefore, this would be: % Rocky Forge electricity of total Virginia = 876,000 MWH / 100,000,000 MWH * 100% = 0.876% But PJM, which is the company that will distribute the electricity generated by Rocky Forge uses a capacity factor of 14.7 percent for wind resources. This means that they expect a wind facility to only produce 14.7% of its rated capacity. Using that factor, 0.876% gets reduced to 0.129%. So that is slightly more than one tenth of one percent. Does this miniscule amount justify the irreparable harm that the project will cause to the environment of North Mountain, the destruction of view sheds, and the adverse impacts to the property values and health of local citizens? During the July heat wave here in Virginia, based on the wind data that Apex is collecting (which they refuse to provide to the public claiming it is "proprietary"), how much electricity would Rocky Forge have produced? Publicly available data shows that wind speeds are lowest in the summer, so what contribution would Rocky Forge have made to reducing emissions of CO2 and usage of fossil fuels during this period?	The commenter is assuming that the assigned capacity rating is based on the project's production at the specific site. This is incorrect. PJM assigns a capacity value to each filing by type of resource (i.e. wind, solar, etc.). This value is the right to participate in a separate capacity market, not the expected generation of electricity by a certain location.  Please also see responses 67 and 74.
152	Kristin Peckman	Dear Mr. Johnson,  I support the development of renewable wind energy in Virginia. Rocky Forge Wind will be the first onshore wind farm in our state, providing the Commonwealth of Virginia with enough clean energy to power up to 21,000 homes annually while providing additional benefits to the local community.  Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue. New local jobs will be created as a result of this project, including 250 jobs during construction and seven full-time employees to manage the site.  The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.  Thank you for your time and consideration.  Regards, Kristin Peckman 8131 Webster Dr Hollins, VA 24019	Rocky Forge Wind appreciates your comments and thanks you for your support.
153	Roy Powell, Jr.	Mr. Johnson: I am a resident of Natural bridge, Virginia in Rockbridge County and a enthusiastic supporter of the Rocky forge Wind development. I am responding in this fashion due a problem with mailing the other type response as originally provided.  Rocky Forge Wind will be the an onshore wind farm that is consistent with the governor's push away from fossil fuel electric generation. I am told that Rocky Forge Wind will provide significant investment to the local economy including revenues for property owners, local government services, and schools for at least 30 years. Over the life of the project, Rocky Forge Wind will add \$20 million to \$25 million in state and county tax revenue and everyone knows in this post Covid World we need more jobs and more tax revenue and more electric power. The modifications to the Rocky Forge Wind application will allow the project to utilize new turbine technology which will result in a more efficient project. For these reasons I urge the approval of the Rocky Forge Wind Permit by Rule modification.  Thank you for your time and consideration.  Roy W. Powell, Jr. 701 Golf Course Road Natural Bridge, VA 24578  Home 540-291-2136 Cell 540-467-0482	Rocky Forge Wind appreciates your comments and thanks you for your support.