



Oregon

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To: Energy Facility Siting Council

From: Chris Clark, Senior Siting Analyst

Date: January 2, 2026

Subject: Agenda Item D (Action Item): Stateline Wind Project Bat Fatality Mitigation for the January 15, 2026, EFSC Meeting

Attachments: Attachment 1: Mitigation Proposal
Attachment 2: Oregon Department of Fish and Wildlife (ODFW) Comments

BACKGROUND

The Stateline Wind Project is a wind energy generation facility in Umatilla County. The facility consists of three phases: Stateline 1, Stateline 2, and Vansycle II (formerly Stateline 3). NextEra Energy Resources LLC is the parent company. Stateline 1 & 2 have been in operation since 2005 and include 186 turbines with a combined peak generating capacity of 123 megawatts (MW). Vansycle II has been in operation since 2009 and includes 43 turbines with a combined peak generating capacity of 101.9 MW. The Site Certificate for the facility was initially approved in 2001. The Energy Facility Siting Council (Council) has subsequently granted issuance of eight amendments to the site certificate. The Council's Final Order on Request for Amendment 7 of the Site Certificate authorized repowering of turbines at Vansycle II with larger rotors. The repowering was completed in 2023.

Condition 93 of the Site Certificate requires the certificate holder to adhere to an approved Wildlife Monitoring and Mitigation Plan (WMMP). The WMMP required the certificate holder to complete one year of post-repowering fatality monitoring following the completion of repowering activitie and use the results to estimate the number of bird and bat fatalities attributable to the operation of the facility. The WMMP establishes "thresholds of concern" for several wildlife species groups, including a 2.5 fatality per MW threshold for bats. Section 10.5 of the WMMP provides that if data from a given year of monitoring show that a threshold of concern for a species group or species has been exceeded, the certificate holder will consult with the Oregon Department of Energy (Department) and ODFW to determine if mitigation is appropriate and, if mitigation is determined to be necessary, the certificate holder will propose mitigation measures designed to benefit the affected species or species group commensurate with the level of impact.

On April 24, 2025, the certificate holder notified the Department that the post-repowering fatality monitoring indicated an exceedance of the threshold of concern for bat fatalities, with

an estimated 5.12 bat fatalities per MW reported during the monitoring year. No other thresholds of concern were exceeded.

On April 30, the certificate holder provided the full monitoring report confirming these results as part of its annual compliance report. On June 11, 2025, the Department published the monitoring results and provided an opportunity for public comment in accordance with Section 8 of the WMMP.

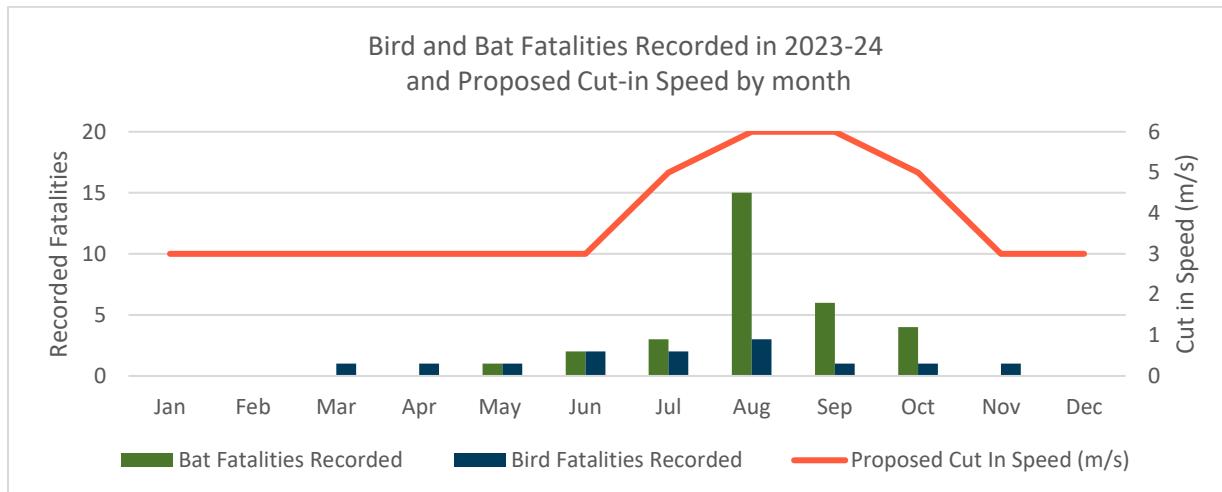
On July 11, 2025, the Department notified the certificate holder that, following consultation with the Oregon Department of Fish and Wildlife, the Department has determined that based on the magnitude of the exceedance and the species affected, mitigation was necessary and requested that the certificate holder submit an initial proposal for mitigation within 90 days.

On October 2, 2025, the certificate holder timely provided its initial mitigation proposal, which is included as Attachment 1 and discussed below. Section 11 of the WMMP authorizes the Department to agree to mitigation actions required under WMMP. The Department must notify the Council of any mitigation actions agreed to, and the Council retains the authority to approve, reject or modify the actions.

PROPOSED MITIGATION

As explained in more detail in Attachment 1, to address the exceedance of the bat fatality threshold of concern the certificate holder proposes to curtail operation of all Vansycle II turbines during low wind speeds for the life of the facility. From November to June, blade rotation would be limited when wind speed is below 3.0 meters per second [m/s], the manufacturer's cut-in speed. The cut-in speed would increase to 5.0 m/s in July and October, and to 6.0 m/s in August and September.

All bat fatalities recorded during the post-repowering fatality monitoring study belonged to two tree-roosting migratory bat species: hoary and silver-haired bats. Both are migratory species which move north to breeding grounds in the spring and south to hibernate in warmer climates in the fall. As shown in Figure 1, below, the certificate holder's proposal would increase the curtailment speed during the months in which the most fatalities were recorded during post-repowering fatality monitoring study, which are assumed to correspond to the times that bats are most likely to be present at the site.



Curtailing turbine operations by slowing or stopping blade rotation at low wind speeds has been shown to be an effective strategy to reduce bat fatalities. One meta-analysis of 29 studies at six North American wind energy facilities showed that curtailing operations below the manufacturer's cut-in speed may reduce bat mortality by as much as 25%, and that efficacy increased proportionally as curtailment speed increased. The study found that at a 5.0 m/s cut in speed, mortality rates for hoary and silver-haired bats were reduced by 48 percent and 52 percent, respectively.¹ Based on the potential reductions documented in the study, the certificate holder estimates that the proposed curtailment would reduce bat fatality rates to 2.49 fatalities per MW per year, which is below the threshold established in the WMMP.

On November 18, 2025, in response to a request from the Department, ODFW provided the memorandum included as Attachment 2. In the memo, ODFW provides support for curtailment as a strategy to minimize and mitigate bat mortality risks associated with wind power projects, and notes that, if implemented, this would be the first wind energy facility to implement curtailment measures in Oregon.

On December 18, 2025, the Department notified the certificate holder that, based on consultation with ODFW and the evidence provided, the Department agreed that the proposed curtailment is reasonably likely to be effective in reducing fatalities of hoary and silver-haired bat to levels below the threshold and agreed to the proposed mitigation. The Department is currently working with the certificate holder to amend the WMMP to document the agreement, how the curtailment will be implemented, and how implementation will be verified.

RECOMMENDED COUNCIL ACTION

The Department recommends the Council approve Vansycle II Wind, LLC's proposal to curtail turbine operations below specified wind speeds to address an exceedance of the threshold of concern for bat fatalities at the Vansycle II phase of the Stateline Wind Project, as presented Attachment 1.

¹ Whitby, M. D., O'Mara, M. T., Hein, C. D., Huso, M., & Frick, W. F. (2024). A decade of curtailment studies demonstrates a consistent and effective strategy to reduce bat fatalities at wind turbines in North America. *Ecological Solutions and Evidence*, 5(3), e12371. Available at: https://tethys.pnnl.gov/sites/default/files/publications/Whitby_et_al_2024.pdf