***VIA E-Mail***

October 2, 2025

Christopher M. Clark
Senior Siting Analyst
550 Capitol St. NE
Salem, OR 97301

ATTN: ODOE, ODFW

Subject: Mitigation Proposal for Bat Threshold Exceedance at Vansycle II

Dear Christopher:

On behalf of Vansycle II Wind, LLC, I am in receipt of your letter dated July 11, 2025, requesting an initial proposal for mitigation measures designed to reduce bat mortality at the Vansycle II Wind Project. We are pleased to propose the following operational mitigation measures to be implemented for the remaining life of the project which are expected to significantly reduce bat mortality.

1. Curtail all project turbines year-round below manufacturer's cut-in speed (3.0 meters/second [m/s]). This measure will prevent turbines from spinning during low wind speeds (i.e., freewheeling) when bat mortality tends to occur and may reduce bat mortality by as much as 25% based on extrapolations from several published studies.
2. Raise the cut-in speed to 5.0 m/s during the months of July and October. These two months had the fourth and third highest raw carcass counts, respectively, during 2023-2024 post-construction mortality monitoring (Tetra Tech 2025[1]). This measure will prevent turbines from spinning during wind speeds below 5.0 m/s and is estimated to reduce hoary bat mortality in these months by an average of 48% and silver-haired bat mortality in these months by an average of 52% based on research published by Whitby et al. 2024[2].
3. Raise the cut-in speed to 6.0 m/s during the months of August and September. These two months had the highest and second highest raw carcass counts, respectively, during 2023-2024 post-construction mortality monitoring (Tetra Tech 2025). This measure will prevent turbines from spinning during wind speeds below 6.0 m/s and is estimated to reduce hoary bat mortality in these months by an average of 63% and silver-haired bat mortality in these months by an average of 67% based on research published by Whitby et al. 2024.

If we use raw carcass counts as a proxy for seasonal timing of bat mortality, then the results of the 2023-2024 monitoring suggest that 90% of the Project's 5.86 bats/megawatt/year occurs between July and

[1] Tetra Tech, Inc. 2025 Vansycle II Wind Project Post-construction Fatality Monitoring Study Report. Prepared for FPL Energy Stateline II, Inc. April 2025.
[2] 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, e12371. https://doi.org/10.1002/2688-8319.12371

October when we propose using raised cut-in speeds (Table 1). We can estimate projected annual mortality by applying the anticipated mortality reductions by month (averaged across hoary bats and silver-haired bats) to each month's approximated proportion of annual mortality and summing the values. This approach results in an annual projection of 2.49 bats/MW (Table 1) and falls below the bat fatality threshold of concern of 2.5 bats/MW/year.

**Table 1. Approximation of Fatality Reductions due to Raised Cut-in Speeds**

| Month | % of Raw Carcass Count (Proxy for Monthly Mortality) | Approximated Proportion of Annual Mortality (bats/MW) | Cut-in Speed raised to (m/s) | Estimated Mortality Reduction Averaged Across Species | Projected Annual Mortality |
|---|---|---|---|---|---|
| July | 10% | 0.59 | 5.0 | 50% | 0.30 |
| August | 48% | 2.81 | 6.0 | 65% | 0.98 |
| September | 19% | 1.11 | 6.0 | 65% | 0.39 |
| October | 13% | 0.76 | 5.0 | 50% | 0.38 |
| All Other Months | 10% | 0.59 | 3.0 | 25% | 0.44 |
| ANNUAL | | 5.86 | - | - | 2.49 |

Vansycle II Wind, LLC believes implementing these operational mitigation measures will effectively reduce mortality of the two state-sensitive bat species and achieve mortality levels below the established 2.5 bats/MW/year threshold. Vansycle II Wind, LLC proposes implementing these measures immediately upon approval by the Oregon Department of Energy, and for the remaining life of the project. Given the numerous studies on bat mortality reductions achieved under the proposed raised cut-in speeds, Vansycle II Wind, LLC believes this strategy will effectively achieve the intended conservation objectives based on the monitoring data collected to date.

Should the Oregon Department of Energy or the Oregon Department of Fish and Wildlife desire to discuss our proposal further, we would be happy to schedule a meeting.

Sincerely,

Julie Garvin
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