



July 2, 2001

Bob Durand, Secretary  
Executive Office of Environmental Affairs  
Attention: Laura Rome, EOE # 12532  
251 Causeway St., Suite 900  
Boston, MA 02114

Attention: MEPA Unit

Re: **Berkshire Wind Power Project, Hancock & Lanesborough**

Dear Secretary Durand:

This Environmental Notification Form (ENF) proposes construction of a wind turbine farm on a ridge in the Berkshires. The Massachusetts Audubon Society supports the development of alternative, environmentally friendly, renewable energy sources. At the same time, we recognize that wind power and other alternative energy facilities may have environmental impacts that are different from the kinds of impacts typically acknowledged and regulated in regard to traditional electric power sources. For wind power, these concerns include possible hazards to migratory birds, and construction impacts on high ridges with steep access roads built in remote rural settings.

In order to maximize the benefits of alternative power sources while minimizing environmental impacts, it would be wise for the commonwealth to take a pro-active approach. For example, the Executive Office of Environmental Affairs might consider working with the Department of Telecommunications and Energy to develop siting criteria or guidelines that promote placement of such facilities in locations that minimize environmental impacts (e.g. wind turbines should be located and designed to avoid the need for aviation warning lights, because lights on structures can present a hazard to birds migrating at night). The Massachusetts Environmental Policy Act (MEPA) office should evaluate whether revisions to the MEPA filing thresholds are needed to capture projects with significant impacts and ensure public review (provided there is MEPA jurisdiction in terms of state agency action or funding). Standard protocols should be developed (with input from MassWildlife) for monitoring whether or not bird deaths occur at wind farms in Massachusetts. This information should then be fed into an adaptive management approach to further guide future project siting and design criteria.

Thank you for considering these comments.

Sincerely,

E. Heidi Roddis  
Senior Policy Specialist

cc: Michelle Carvalho, Baystate Environmental Consultants  
MassWildlife  
Berkshires Natural Resources Council