



Working with you to protect the environment in the Berkshires and beyond

December 22, 2009

Aisling Eglington, MEPA Analyst
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2524

RE : EEA# 13143 - Hoosac Wind Project in Florida and Monroe

Please accept these comments from the Berkshire Environmental Action Team (BEAT) on the Hoosac Wind Project in Florida and Monroe, EEA# 13143

Berkshire Environmental Action Team (BEAT) is a 501(c)3 not-for-profit environmental organization with the mission of protecting the environment in the Berkshires and beyond. BEAT's 2010 Theme is Helping Wildlife Cope with Climate Change: Decreasing the impact of the transportation network on ecosystem and wildlife habitat connectivity – Protecting and reconnecting wildlife habitat linkages among our already protected landscapes.

Please require the proponent to file a full-scope Environmental Impact Report (EIR).

Habitat Fragmentation

BEAT strongly opposes the fragmentation of the last remaining large, intact forest blocks. These are important wildlife habitat areas that should be kept intact and linkages among them should be maintained, reestablished, and protected. Industrial wind projects should be sited where there is existing infrastructure to support it. We support the concept of a proposed wind facility in Brimfield along the Mass Pike. This would not cause new habitat fragmentation and has existing infrastructure to carry the power produced. Siting of industrial wind projects is critical, and the environmental impacts as well as the benefits should be carefully reviewed.

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It is unclear whether any of the proposed work would be within the designated Forest Reserve and thus be prohibited. Also, the Department of Conservation and Recreation visioning process is still going on, but one result of this process could be to include additional acreage in the Forest Reserves which might place the proposed work in a newly designated reserve.

Segmentation

BEAT is extremely concerned that this, and other industrial wind projects in western Massachusetts, have submitted information in Environmental Notification Forms (ENFs) that did not really encompass the full scope of the entire project. The proponents then submit Notices of Project Change (NPCs) that, if the entire project had been properly submitted to begin with, would trigger a mandatory Environmental Impact Report (EIR). We believe this is another form of segmentation and should not be allowed. Please require the proponent to file an EIR.

Mandatory Threshold Exceeded and many questions unanswered

We believe that Hoosac Wind already exceeds the EIR threshold for disturbance of greater than 50 acres of land. We do not believe all the land disturbance impacts have yet been made clear, including what specifically the impacts will be in the Monroe State Forest. Perhaps an alternative should be proposed to using our public State Forest for this private, commercial energy facility. The potential impacts to our State Forest should at a minimum receive a public hearing with all stakeholders of the State Forest invited to make clear what the impact to our public lands will be.

We do not believe all wetland impacts have been made clear and thus we cannot properly evaluate whether the proposal avoids, minimizes, and mitigates these impacts sufficiently. Thus we believe the proponent should be required to file a full EIR.

BEAT believes there will be additional impacts when the proponent looks at bringing in the turbines on existing roads. We believe several streamcrossing locations and possibly turns may need to be modified to support such large, heavy loads. This information, and the impacts if any, should be included in the EIR submission.

According to the Berkshire Regional Planning Commission, this project has accepted \$250,000 from the Massachusetts Executive Office of Energy and Environmental Affairs to support the extensive environmental research that has been conducted at the site. BEAT believes that this constitutes state funding and full-scope MEPA jurisdiction applies.

A question arose at the Berkshire Regional Planning Commission review that the MegaWatt energy production of this project appears to have remained the same as in the earlier filing, but the estimated tonnage of pollutants displaced (SO₂, NO_x, and CO₂) has increased from the figures offered in the original ENF. We would like clarification on this.

BEAT believes that an EIR should require the proponent provide an additional, updated alternatives analysis considering such factors as using fewer, larger turbines or spacing the turbines in a more compact configuration using newer technologies.

BEAT believes that an EIR should require additional bat studies and analysis. Our understanding is that the current studies were conducted at a height well below the full height of the spinning blades. We would request a more comprehensive study, and an analysis that takes into consideration the catastrophic plight of bats in this region due to white-nosed syndrome.

BEAT believes that an EIR should require more information on the revegetation plan near the turbines and under the power lines. How will vegetation height be limited? Will herbicides be applied, and if so what and how?

BEAT supports the comments made by Mass Audubon and the Berkshire Regional Planning Commission's Clearinghouse Review Committee on December 14, 2009.

Please require the proponent to file a full-scope Environmental Impact Report (EIR).

Thank you for considering our comments.

Sincerely,

Jane Winn