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Michael Fraysier
ANR Lands Director
Vermont Dept. of Forests, Parks and Recreation
103 South Main Street, 10 South
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Dear Michael:

Audubon Vermont is pleased to be able to offer our comments on the proposal to site wind towers on state lands. Audubon Vermont is the statewide organization representing the 4300 Vermont members of the National Audubon Society and their families. Eight Audubon chapters in Vermont, distributed geographically, provide a local Audubon presence across the state. Audubon Vermont's mission is to protect birds, wildlife, and their habitats in Vermont.

We support development of wind energy and other alternative energy sources for several reasons. Global climate change, largely as the result of fossil fuel combustion, will cause massive wildlife mortality and extinctions this century unless we take strong steps to reverse current trends. As part of a comprehensive energy conservation program, development of wind power and other alternative sources can slow this threat by reducing greenhouse gas emissions. It is one way Vermont can combat this problem directly. Since we are part of the problem, we feel we have an obligation to be part of the solution.

But wind power comes with its own concerns, including 1) the potential for collisions of birds and bats with towers, 2) tower support infrastructure, which invariably results in the loss of undeveloped land that is of consequence to at least some wildlife species, 3) wind towers change the aesthetics of ridgeline scenery.

We recommend the following:

1. Developers should be given incentives to consider sites on private land in preference to public lands.
2. The state should prepare a list of state-owned sites that are clearly and unequivocally unacceptable for wind towers, the ridgeline of Camel's Hump, for example. State parks are likely to be unacceptable because they receive significant public visitation. The intentions of donors of land to the state should be given careful consideration.
2. The state should prepare a second list of state-owned sites that may be suitable insofar as they do not have obvious environmental or aesthetic flaws. Development of these sites might take place following environmental impact studies, while assessment of other, more vulnerable sites is underway. The list of approved sites should be developed with public participation and should precede and guide consideration of developers' proposals.
3. Any site proposed for development should be subject to environmental impact studies including pre-siting radar studies, and, if indicated, post-siting studies allowing for reassessment of decisions, to determine if a site is on a significant travelway for birds or bats. Studies should begin immediately on the most likely sites.
4. Mitigation measures should be identified and in place before a site is developed. Mitigation fees should be used to fund conservation measures to counterbalance the loss of habitat from tower development.
5. Characteristics of sites that would render them unsuitable should include: presence of rare, threatened or endangered species, rare or exemplary natural communities, old growth forest, extensive unroaded or unfragmented areas, or presence of a portion of the Long Trail or Appalachian Trail Corridor. High elevation ridgeline is not only more fragile environmentally

than lower elevation sites, it also is likely to have a larger, more conspicuous viewshed. Thus, lower elevation sites should stand a greater chance of approval than high elevation sites.

6. We encourage the following wind tower attributes:

- * sites with existing roads and clearings rather than sites requiring new roads and clearings
- * transmission lines and substations co-located with access roads rather than located separately
- * shorter rather than taller towers
- * monopole construction rather than guyed, lattice construction
- * unlit towers rather than lit towers
- * white strobe lights rather than red continuous lights
- * locations back from an escarpment rather than right on it

7. We recommend the requirement of a bond to guarantee restoration of a site with native vegetation if inoperative for six months.

Thank you for the opportunity to comment on this issue.

Sincerely yours,

Jim Shallow
Executive Director