



Union of Concerned Scientists
Citizens and Scientists for Environmental Solutions

April 27, 2004

Berkshire Regional Planning Commission
Regional Issues Committee
1 Fenn Street, Suite 201
Pittsfield, MA 01201

Dear Committee Member:

I am writing to you on behalf of my organization, the Union of Concerned Scientists. In my role as the manager of the New England Clean Energy Project, I was interested to learn very recently about your efforts to develop a regional wind policy for the Berkshire Regional Planning Commission (BRPC). In particular, I learned Friday that your Committee is meeting on April 28, 2004 to discuss a draft policy document and develop recommendations for action. UCS is keenly interested in BRPC's efforts to develop a regional policy specifically because of the region's unique potential to benefit from properly sited and operated wind power.

While I am not able attend your upcoming meeting in person, I would like to introduce you to the Union of Concerned Scientists (UCS) and our perspectives on wind development with the hopes of informing and supporting your on-going decision-making process.

Background on UCS

UCS is an independent nonprofit national alliance of more than 100,000 concerned citizens and scientists. Founded over 30 years ago, UCS combines rigorous analysis with committed advocacy to reduce the environmental impacts and risks of energy. UCS' energy program focuses on encouraging the development of clean and renewable energy resources, such as solar, wind, geothermal, and biomass energy, and on improving energy efficiency. Participating in the design and implementation of renewable policies is one way UCS actively works toward these ends.

In addition, UCS has participated in the development of policies and market rules throughout New England in support of an expanded role for renewable and environmentally preferable energy. Recognizing the critical role that renewable energy can and should play in improving the resource diversity and environmental sustainability of our regional electric grid, UCS submits this letter as part of our continuing efforts to establish, support, and improve the various public policies affecting electricity resource portfolios at the state and federal level.

The Challenge

Through your efforts to develop a regional wind development policy, you have no doubt become aware of the many negative impacts of our current electricity generation system and the risks it poses. The widespread damage done to the environment from the reliance fossil fuels includes degraded air quality, land, and water. Humans, wildlife, and precious landscapes all suffer the direct and indirect consequences of using fossil fuels. The use of nuclear power requires similar degradation to land and water for uranium ore, as well as posing monumental risks to the environment and human health from radioactive wastes.

The carbon emissions coming from electric generators make up a significant share of this region's and the U.S.'s contribution to heat-trapping gasses. These emissions threaten the stability of the earth's climate and, if not addressed, will push eco-systems and economies here and around the world to their limits. Using every tool available to reduce carbon emissions is a top priority of UCS. We strongly believe that in order to avoid the worst outcomes posed by climate change, we must begin implementing a broad array of solutions immediately. Delaying action in addressing carbon emissions only increases the eventual severity, expense, and likelihood of irreversible and frightening losses.

Closer to home, New England has rapidly become highly dependent on natural gas to fuel our power plants. While it is cleaner-burning than some other fossil fuels, depending on natural gas to power our homes and businesses comes with a hefty price tag. Natural gas prices have increased significantly in recent years, and are quite volatile, which is then reflected in electricity prices. This lack of fuel diversity is a threat to the reliability of our electric system, as the close call with rolling blackouts during last winter's severely cold weather demonstrated. The economic well being of our region is further threatened by the risk that high, volatile natural gas prices pose.

Natural gas is imported to into our region using pipelines that pose security risks. While we here in New England do not have to live with it, the damage done to the environment to extract increasing amounts of natural gas in ever more sensitive lands is significant. As North American supplies become scarcer, we will need to build liquefied natural gas (LNG) terminals and put our energy system in the hands of countries that export natural gas, many of which are the same countries that supply our oil. The economic and political toll of dependence on imported oil has been abundantly clear to our nation in the last year. In sum, over-dependence on natural gas as the predominant electric generating fuel poses a multitude of compelling disadvantages that must be addressed.

The Solution

There is no single silver bullet available to address the challenges I've raised here. We must seek to maximize the best set of solutions available to us. UCS is one of many organizations that actively support policies and aggressive actions to clean up existing power plants and use

electricity in the most efficient way possible. While UCS believes these two strategies are critical, they can only partially address the need to develop a sustainable, safe, diverse, and environmentally sound energy system. Another critical component of such a system is the increased use of homegrown renewable energy sources such as wind. Renewable energy has increasingly become an environmentally sustainable and economically sound solution.

As you are probably aware, wind power is the fastest growing source of electricity in the world, and has been for the last few years. The cost of wind electricity has come down by 80-90% over the past two decades. The Electric Power Research Institute projects that the cost of renewable energy will continue fall to levels that are competitive with conventional energy sources over the next 5-15 years. Some wind power at the best sites is already competitive with other electricity sources. However, even when they cost somewhat more, renewable technologies like wind can help stabilize electricity prices because their fuel and operating costs are low, and because they create competitive pressure to restrain the price of fossil fuels, particularly natural gas. In addition, renewable energy sources like wind do not impose the large costs to the environment and human health that fossil fuels do.

While the overall impacts of wind power are comparatively small, no energy source is free of impacts, and not all locations are appropriate for wind development. Poorly sited, designed, or operated wind facilities are not an acceptable solution to meeting the challenges we face. Ensuring that wind power development is appropriately sited and properly operated poses a new set of challenges, especially for the communities considering wind proposals.

Local and Regional Decision-Making

The opportunity to develop wind resources in the Berkshires and elsewhere in New England raises a complex array of questions associated with evaluating specific wind facility proposals. Because commercial-scale wind power facilities are relatively new to most of New England, including the Berkshires, many residents and decision-makers are unfamiliar with it. It is important that this unfamiliarity does not lead to putting unnecessary restrictions on wind or hold wind power to a higher standard for approval than other, more familiar but more environmentally risky technologies.

UCS' extensive commitment to advancing opportunities for renewable energy in New England has provided us with the opportunity to develop knowledge and expertise on many aspects of wind power. UCS will be releasing shortly some educational materials that we hope will be helpful to the BRPC in your policy development process. Our goal is to present the issues raised specifically by your policy draft and generally by wind power development proposals in the region and to provide balanced information about wind benefits and impacts based on facts. Specifically, our materials will address:

- Environmental benefits and impacts of wind power facilities
- Current cost of wind power relative to alternatives

- Economic benefits and impacts of increasing wind power
- The technical feasibility of wind power and operational considerations
- The policy implications of wind power development

Given the alternatives for electricity generation and supply, UCS believes that wind is a low impact and clean air option that deserves full and immediate consideration. It is important that decisions regarding wind energy development be based on a balanced consideration of not only a specific project, but also the broader ramifications of continuing to rely on the current electricity system. We also believe that local decisions should be made with due consideration to state and national policies, as well as local concerns. The determination of whether a proposed wind site is appropriate must come after a careful assessment based on its unique characteristics.

It is UCS' belief that wind and other renewable resources deserve the opportunity to compete with conventional resources on a level playing field, carefully and fully balancing local, regional, and national interests. In many ways, the draft policy document raises and addresses the major issues surrounding the evaluation of wind development proposals. However, there are some components of the policy draft that UCS views as overly conservative and are likely to discourage even the most desirable and appropriate proposals. As such, UCS recommends that a wind development policy for the Berkshires:

- Allows project review to rely on recent experience and the growing body of knowledge regarding wind facility impacts and operations where appropriate
- Fully considers the unique characteristics of individual development proposals
- Avoids erecting unnecessarily high or costly barriers to development
- Refrains from calling for a moratorium on consideration of wind development proposals

We encourage the BRPC to continue its work on the regional wind policy and look for places to encourage this kind of balanced approach to decision-making.

Conclusion

UCS views the opportunity to consider sound wind development proposals in the Berkshires and round New England as the opportunity to begin a journey down a road toward a sustainable energy future. The involvement of local communities is an essential component of a successful future for wind power. But when wind power and other renewable energy sources are systematically rejected or evaluated using inaccurate or outdated facts, by default we will continue down the current unsustainable path. Doing so simply exports the direct impacts of fueling our electricity appetites to distant communities and perpetuates the direct and indirect impacts on our local economy and environment.

UCS appreciates the opportunity to share our initial thoughts with you. If you wish to speak with me during your meeting, please feel free to contact me by phone at 617-547-5552. I would also

be happy to meet with you in the future, so please do not hesitate to call me. You will be receiving UCS' fact sheet on Wind Development in New England shortly.

While UCS greatly appreciates the extensive work that you have undertaken, I encourage the Regional Issues Committee to continue to seek input on its draft policy and to consider the comments and feedback offered by UCS and others before finalizing the document. I look forward to future opportunities to participate in your process.

Respectfully submitted,

/s/

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