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August 7, 2012

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VIA ELECTRONIC MAIL

Ms. Linda Roberts
Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Dear Ms. Roberts:

ENE writes to submit comments regarding the Connecticut Siting Council's ("CSC") draft regulations for siting wind power projects. ENE strongly supports the development of a transparent, clear, and predictable siting process for wind power in Connecticut. ENE believes that the CSC's draft regulations can be an important tool in helping to advance critical energy policy goals in Connecticut – such as maximizing the deployment of clean energy, reducing carbon pollution, and increasing the state's energy independence and economic security.

ENE is a nonprofit organization that researches and advocates innovative policies that tackle our environmental challenges while promoting sustainable economies. ENE is at the forefront of state and regional efforts to combat global warming with solutions that promote clean energy, clean air, and healthy forests. For more than a decade now, ENE has been strongly committed to building a clean energy future for Connecticut.

Overall, ENE is supportive of the CSC's draft regulations. They appear to satisfy the statutory charge laid out by Connecticut's General Assembly in Public Act 11-245, An Act Requiring the Adoption of Regulations for the Siting of Wind Projects. They address the wind power siting issues identified by the Act, such as setbacks, shadow flicker, noise, ice throw, and other potential impacts. They also help bring clarity to, and set expectations around, a balancing process that can be difficult. Trade-offs in siting energy projects are to some extent unavoidable. What is perhaps most important is that the siting process itself be transparent, fair, and predictable for all stakeholders and for all types of energy generation. ENE believes the CSC's draft regulations generally meet this procedural goal.

ENE encourages the CSC – as it finalizes the draft regulations based on public input – to review with care the siting best practices developed by other states that already have experience with wind power to ensure that the CSC's draft regulations accord with those practices, especially on noise and setback standards. Several useful, publicly-available resources exist on best practices for wind power siting.¹ ENE would like to recommend, for instance, a recent report issued by the National Association of Regulatory Utility Commissioners entitled, Wind Energy & Wind

¹ See, for example, the U.S. Environmental Protection Agency's website, *RE-Powering America's Land*, www.epa.gov/renewableenergyland/, which contains links to wind siting resources.

Park Siting and Zoning Best Practices and Guidance for States (January 2012).² ENE also recommends that the CSC review a recent study on the potential human health impacts of wind power prepared for the Massachusetts Department of Environmental Protection.³ These resources not only provide credible, authoritative information on best practices and the latest science, but they also show that wind power siting can be implemented successfully and sustainably.

Finally, ENE recommends that the CSC consider issuing a brief explanatory document along with the final proposed regulations that would summarize: (1) the wind power siting research the CSC assessed in this proceeding; (2) the main points raised by the different participants to this proceeding; and (3) the CSC's overall analysis of those points and how it arrived at the language of the proposed siting regulations. This kind of document would help give more context to the final language of the regulations and thus serve as a useful guide for the public, for stakeholders, and for the General Assembly.

ENE commends the CSC on its work to date on the draft regulations, and also thanks the CSC for the opportunity to comment on this important issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "W. E. Dornbos".

William E. Dornbos
ENE Connecticut Director

Enclosures

cc: Melanie A. Bachman, Esq.

² A pdf copy of this report is enclosed with our comment letter. The report is also publicly available at: www.naruc.org/Publications/FINAL%20FINAL%20NRRI_Wind_Siting_Jan12-03.pdf.

³ See the enclosed study entitled, Wind Turbine Health Impact Study: Report of Independent Expert Panel (January 2012). This study surveyed the current state of knowledge regarding wind power's potential human health impacts. It is publicly available: www.mass.gov/dep/energy/wind/turbine_impact_study.pdf.