

**Berkshire Regional Planning Commission
Clearinghouse Review Report**

~~April 1~~~~March 11~~, 2010

~~DRAFT~~**FINAL** COMMENTS

SUBJECT: MINUTEMAN SAVOY WIND PROJECT
EOEA#: # 14513
LOCATION: SAVOY
ESTIMATED COST: \$35,000,000
REVIEW TYPE: EXPANDED ENVIRONMENTAL NOTIFICATION FORM
PROPONENT: MINUTEMAN WIND, LLC.
COMMENTS DUE: ~~April 9~~~~March 12~~, 2010

PROJECT DESCRIPTION:

Minuteman Wind, LLC proposes to develop a 12.5 MW wind farm on a 293-acre parcel of private land on West Hill in Savoy, Massachusetts. The proposed wind farm consists of five (2.5 MW) wind turbines, mounted on white monopole towers with cement foundations each with a hub height of two hundred sixty-two (262') feet and approximately four hundred twenty (420') feet from natural grade to the blade at its highest point. Each wind turbine will be accompanied by an enclosed power converter and generator step-up transformer. An 800 square foot maintenance building will also be located at the top of the hill. A single access pitched gravel road will run approximately 5,000' from Harwood Road to the top of the hill and then to each wind turbine. The construction of the access road will likely require a significant amount of fill to be brought onto the site.

The five wind turbines will be interconnected through an underground collection circuit routed from turbine to turbine along the side of the gravel access road. At the top of the hill, the circuit will be brought above ground and placed on 40' tall utility poles leading to an on-site electric substation bordering Harwood Road. The 1,280 square foot electric substation will be located in a 6,400 square foot clearing along Harwood Road. Approximately 3,000 feet of new utility poles and lines (15 new poles) will need to be installed along Harwood Road to connect the project to existing utility infrastructure.

A 800 square foot garage/utility shed will also be constructed at the base of the site adjacent to Harwood Road. Two staging or laydown areas will be created. A 71,875 square foot area at the top of the hill will need to be cleared and a 9,500 square foot staging area at the bottom of the hill along Harwood Road, has already been cleared and graded due to past logging activities. The staging areas will be revegetated once construction is complete.

The proposed project is expected to produce enough electricity to power 3,000 homes and will displace an estimated 11,730 tons of carbon that would be produced each year by a conventional fossil-fueled power plant producing the same electricity.

MEPA ENF thresholds being exceeded include land (> 25 acres of disturbance) and state action (Minuteman Wind, LLC received financial assistance from Massachusetts Technology Collaborative).

CONSIDERATIONS AND POTENTIAL ISSUES:

Consistency with Local and Regional Plans

The development of wind energy in the Town of Savoy is consistent with its adoption of a new wind zoning bylaw in 2008. The wind energy zoning bylaw details the approval process and sets standards for

Berkshire Regional Planning Commission Clearinghouse Review Report

the development of wind energy to protect the public interest. The EENF does not document in detail whether or not the project as proposed is consistent with the bylaw, nor has BRPC undertaken such an analysis. One instance of potential inconsistency is section 9.7.2 of the Savoy Commercial Wind Energy Facility Bylaw, which deals with shadow/flicker, places the burden of proof on the proponent to prove that shadowing or flickering does not have significant adverse impacts on neighboring or adjacent uses.

- The EENF does not meet the burden of proof in proving that shadowing or flickering does not have significant adverse impacts on neighboring or adjacent uses. If the shadow/flicker effects from this project are considered significant then this project is not consistent with the Town of Savoy's bylaw.

The *Regional Plan for the Berkshires* was adopted by the Berkshire Regional Planning Commission in 2000. One of the policies stated in the plan reads to “encourage the use of solar and wind energy generation where appropriate provided that facilities are sited in such a way as to not significantly distract from aesthetic, wilderness, recreational, or ecological values.”

- The EENF as submitted does not contain sufficient information to determine whether the project as proposed is consistent with the *Regional Plan for the Berkshires*.

Land Disturbance

According to the EENF and supplemental materials the project will disturb approximately 26.2 acres of land (25.7 acres on-site, 0.49 acres off-site). After construction is completed, 9.7 acres will be allowed to naturally re-vegetate to forest. The proponent will create approximately 11,412.50 square feet or 0.26 acres of impervious surface and construct structures covering 17,812.50 square feet. An on-site single access gravel road will be constructed over existing skid roads and cover 4.6 acres of land. In order to construct this gravel road, an additional 9.5 acres of land will be disturbed and covered with rocks and vegetation. Along a section of this gravel road, a 40' right-of-way will be cleared to enable the installation of utility poles and overhead electric lines. Along the top of the hill, a trench will be excavated along the side of the gravel road to carry electric lines from turbine to turbine.

According to the supplemental information, ~~one~~^{two} off-site gravel roads will also be constructed to enable the transportation of turbine components. ~~The off-site~~^{Each} gravel road will be approximately 450' to 500' long and cover approximately 7,200 square feet of land ~~each~~ for a total of approximately 0.153 acres. ~~It does not appear that either of these roads have been accounted for in the total off-site land disturbance calculations.~~

According to the additional supplemental material provided, the proponent will create eight traffic pull off areas in Savoy to allow trucks room to pull off and allow car and truck traffic to pass. The additional land disturbance ~~from the truck pull offs~~ is anticipated to be 14,400 square feet (0.3349 acres). However, the EENF contained no discussion as to whether or not the truck pull off areas will be restored upon completion of construction of the wind turbines.

- The EENF does not include all anticipated off-site impacts. The route review submitted as supplemental information, indicates that improvements such as fill and grading are required to achieve turning radii at several intersection. These improvements should be accounted for.
- The EENF improperly characterizes the 4.6 acres of gravel roads as pervious surface. [The supplemental material provided by the proponent states that gravel roads are not defined in Massachusetts as impervious surfaces. However, the *Massachusetts Erosion and Sediment*](#)

Berkshire Regional Planning Commission Clearinghouse Review Report

[Control Guidelines for Urban and Suburban Areas](#) defines impervious as a “material through which water cannot pass, or through which water passes with great difficulty” and pervious as a “material through which water passes relatively freely”. (MADEP 1997) In addition, the [Massachusetts Unpaved Roads Manual](#) states that “for an unpaved road to shed water properly, it should have a tight, impervious surface”. (BRPC, 2001, p. 8)

[The supplemental material also refers to MA DEP’s definition of impervious surfaces in its proposed stormwater regulation. This definition is not applicable since the proposed regulations specifically address a new statewide Stormwater General Permit Program which will require private owners of large impervious surfaces to manage stormwater. The definition of impervious included in the proposed regulations is limited to “a paved parking area, a paved access road or driveway, a paved area used for the storage and/or maintenance of vehicles and/or equipment; a paved area used for the storage of materials, products and/or waste and a roof, other than a green roof constructed in accordance with the Massachusetts Stormwater Handbook” and does not include many impervious surfaces such as sidewalks and courtyards.](#)

The gravel roads will need to be highly compacted to support the weight of the trucks and equipment. A highly compacted gravel road [does not allow water to pass relatively freely but rather with great difficulty or not at all and](#) should be ~~treated as~~[considered an](#) impervious surface [not a pervious surface.](#)

Stormwater

Dealing with stormwater along ridgelines and steep slopes is challenging. The EENF states that the runoff from the tower pads, maintenance building and substation will naturally infiltrate back into the ground. The proponent provided, as part of the supplemental material, a stormwater management system design for the on-site gravel access road to collect and dispose of stormwater. The gravel access road will be pitched to disperse run off into a grassed swale along side the entire gravel access road, with check dams to slow flowing water, catch basins to trap sediments, pipes to carry water under the road and stone spillways to slow down discharging stormwater into the adjacent vegetated forestland. The grade of the access road will average approximately 7% with the steepest grade around 10%.

- The supplemental material provides that vegetated swales and deep sump catch basins will be used to collect stormwater from the gravel access road. The discussion of stormwater management controls is not adequate to determine if the standards within the Massachusetts Stormwater Management Policy have been met. [For example, the proponent has not provided a long term pollution prevention plan or an operation and maintenance plan.](#)
- The supplemental material does not provide adequate information on construction best management practices to determine how stormwater, sediment, or erosion will be addressed during the construction phase of the project.
- The proponent should closely monitor the roadway and stormwater control measures when the roadway is being used by semi-tractors to transport turbines and equipment to the top of the hill.

Wildlife & Rare Species

The EENF includes a letter from Massachusetts Natural Heritage & Endangered Species Program (“Natural Heritage”) confirming that no endangered species habitat is mapped on or near the project site.

Berkshire Regional Planning Commission Clearinghouse Review Report

According to the EENF, an independent wildlife biologist searched the project site for known local endangered species and found none. To the proponent's credit, a number of avian impact studies have been performed at the project site. A Phase One Avian Impact Analysis (i.e. literature review) was conducted for the project site. Subsequently, an on-site study of breeding birds and an on-site migrating raptor study were performed. The breeding bird assessment found no endangered bird species on or near the project site and the migrating raptor study concluded that the project site is not a major raptor migratory route. The proponent has agreed to conduct one year of post construction bird and bat mortality monitoring in coordination with Natural Heritage.

The transportation route assessment provided in the supplemental information, indicates that up to 4,700 square feet of alteration may occur in NHESP estimated and priority habitats located in Westfield (City View Road) and Becket (Route 20 and Route 8). However, the anticipated areas of disturbance are managed lawn and disturbed roadway shoulder.

- The EENF does not include an on-site impact analysis for bats or nocturnal bird species. Thus, the likely impact on bat and nocturnal bird species is unknown. The unknown effects that this project may have on nearby bat populations is a significant concern of this Commission due to the severe decline in bat populations attributable to white nose syndrome.
- A pre-construction study of bats and nocturnal birds will make the post-construction study even more valuable in assisting researchers to discover a reliable method of proactively classifying a proposed sites risk to wildlife.
- The proponent should be commended for agreeing to one year of post-construction monitoring for bird and bat mortality. However, post construction monitoring without a contingency plan merely identifies a problem.
- Although the proponent considers the NHESP estimated and priority habitats to be disturbed of insignificant value, the proponent should work closely consult with NHESP to protect this valuable area of land and should consult with NHESP before any unanticipated determine their actual value before work is undertaken within these designated areas.

Water Resources

The project site contains a number of wetlands, which are reportedly non-jurisdictional wetlands under the Wetlands Protection Act. The proposed project will directly impact one jurisdictional wetland on-site, between turbines # 4 and # 5. Here, the proposed access road will cross a wetland resource area, impacting an approximate 1,153 square feet of wetland. According to the supplemental information provided by the proponent, the construction of one off-site gravel road will impact 7,082 square feet of Riverfront Area. In addition, based upon a review of the transportation route an additional 1,700 square feet of Riverfront Area in Westfield and Becket may be altered, for a total of 8,782 square feet of disturbed Riverfront Area. The proponent has provided no information or plans to mitigate or avoid impacts on the Riverfront Area, or how they plan to comply with the Performance Standards for Riverfront Area required under the Wetlands Protection Act.

The proponent frequently refers to their activities in the wetland areas as "limited project" activities; however, this does not relieve the proponent of their obligation to conduct wetland replication. Furthermore, the supplemental information indicates that wetlands may exist along Harwood Road where 15 new utility poles are planned. The proponent plans to delineate this area once the snow cover melts.

Berkshire Regional Planning Commission Clearinghouse Review Report

The proponent, in the supplemental material, commits to replicating a minimum of 1,153 square feet of wetlands. Minuteman is leaving the location of the wetlands mitigation open for input and approval from the Savoy Conservation Commission and Massachusetts Department of Environmental Protection. Due to the Riverfront Area impacts in Westfield and Becket the proponent will need to receive an order of conditions or negative determination from those Conservation Commissions before undertaking the proposed work.

- The EENF provides no information, documentation or plans showing how the proponent plans to mitigate or avoid direct impacts to the wetland resource and Riverfront Areas as required by the Wetland Protection Act.
- The supplemental material is not adequate to determine if the proposed wetland replication meets the requirements of the Wetlands Protection Act.

Shadow/Flicker Impacts

The EENF includes a shadow/flicker study performed by the UMass Renewable Energy Research Laboratory (RERL) to determine the likelihood that nearby residences would be exposed to shadowing or flickering due to the proposed project. The shadowing and flickering effect on receptors tends to vary with the time of day, season, wind direction, and sunlight.

- The UMass RERL study found that approximately nine (9) residences could be affected by shadowing/flickering impacts. The residences affected would be subject to shadow/flicker effects for 10 to 30 minutes each day for approximately 50 to 80 days per year depending on the location of the residence.
- The proponent should discuss the results of the shadow/flicker study with the occupants of the residences potentially affected and work with them to mitigate these anticipated adverse impacts.

Visual Impacts

The EENF contained photo simulations prepared by UMass RERL using WindPro software to simulate tower construction from varying locations in Savoy. The proponent has also submitted a viewshed analysis using GIS software.

- The EENF contained only daytime photo simulations. The proponent should conduct a visual impact assessment including pre- and post-construction photo simulations of the project as seen both during the day and at night with anticipated lighting.
- The viewshed analysis did not contain any legible street names or other identifiable locations to aid in determining the locations from which the project can be seen.
- ~~The proponent did not conduct a balloon test. To best illustrate the visual impacts of the project, the proponent should offer to fly a large balloon for each turbine, to be flown at blade tip height.~~
- The EENF indicated that the FAA required lighting would be installed on the nacelle, which leaves approximately 150' feet of unlit area measured from the hub to the tip of the blade at its highest point presenting a hazard to air navigation.

Berkshire Regional Planning Commission Clearinghouse Review Report

Noise

The proponent has submitted a noise analysis to predict the potential noise levels generated by the wind project. The analysis shows that the increase in noise from the project will be 1 dbA at the property boundary and 1 dbA or less at nearby properties. This increase is well within the acceptable noise limits set by the Department of Environmental Protection's, Division of Air Quality Noise Regulations (310 CMR 7.10), which permits a 10 dbA increase in sound from ambient noise levels.

- The EENF provides no discussion of expected noise levels during the construction phase of the project, which includes the operation of heavy equipment and potential blasting of rock.

Transportation Route

The proponent hired ATS Wind Energy Services and Hill Engineering to conduct a routing study of potential equipment delivery routes. The proponent no longer intends to use I-90. The proposed delivery route is as follows, from the CT border on Route 202 North to Westfield, then on Route 20 West from Westfield to Becket, Route 8, then in Dalton from Route 8 to Route 9 East (Route 8A-North) and then to Route 8A in Windsor to Savoy. Intersection improvements are anticipated in Westfield, Becket, Windsor and Dalton. Once in Savoy, trucks will travel along Route 8A/116, then north on Upper Loop Road to Chapel Road, then east on Brier Road, which then becomes Harwood Road and then to the project site. Upon further review of the intersections in Savoy, the proponent indicates that no intersection improvements are necessary to achieve proper turning radii. However, due to the length of equipment, the proponent will construct a new gravel road through private land and rejoin Brier Road. The proponent will work with the Savoy Highway Department on these and other improvements. An alternative transportation route may be from CT border on 91 North to exit 24 then onto Route 5 North, then to Route 116 West into Savoy.

The supplemental information provided by the proponent did include a more in-depth route review. The route review indicated that to achieve acceptable turning radii at intersections in Westfield, Becket, Windsor, Savoy, and Dalton, and Westfield improvements will be necessary. Suggested improvements to these intersections are bringing in fill, grading, and removal of traffic islands, and even the installation of a culvert, which raises questions of potential wetland impacts that have not been accounted for. With respect to any transportation improvements, the proponent provides no definite site plans to make these improvements, nor do they attempt to quantify what additional impacts are anticipated. In addition, the capacity of the bridges on the entire planned transportation route is still an unresolved issue that could dramatically affect off-site impacts if an alternative route is necessary.

The proponent has acknowledged that uncertainty still remains with the transportation route and has offered to provide MEPA with a final delivery route prior to commencement of the project.

- The transportation of such large equipment along the planned transportation route will likely cause significant traffic problems on these heavily traveled streets and highways. The proponent indicates in the EENF that it will coordinate with local public officials to deal with traffic concerns, does not contain a discussion of how these traffic impacts will be mitigated or avoided. We believe that this consultation should be undertaken before this project completes MEPA review as the impacts, although perhaps temporary, appear to be significant and we would question the viability of the planned route through the City of Westfield, even though that is out of our region.
- The EENF contains no in-depth discussion of any posted bridges which may exist along the planned transportation route and indicates that a more thorough study will be undertaken when

Berkshire Regional Planning Commission Clearinghouse Review Report

~~Minuteman applies for a state wide loads permit. whether or not the equipment can be safely transported across these bridges.~~

- The EENF does not provide site plan level details about the planned intersection improvements, whether or not they will be permanent, and whether or not these areas will be revegetated. ~~and whether or not any additional wetlands will be impacted.~~
- The proponent should ensure that drainage systems at the existing intersections are not disturbed or changed especially in light of the fact that some work will occur in Riverfront Area that is also designated as NHESP estimated and priority habitat.
- In order to accurately quantify anticipated off-site impacts, the proponent should determine the feasibility (i.e. turning radii, bridges, etc.) of the transportation route.

Historical/Recreational/Cultural Impacts

The EENF contained no discussion of the project's impact on historical, recreational or cultural resources in Berkshire County. The viewshed map did not identify any known historical, recreational or cultural sites in Savoy or the surrounding area. The EENF indicates that Minuteman convened numerous public forums, hearings, and town meeting presentations and that potential impacts on historical, recreational, and cultural resources has never been raised.

- ~~The EENF did not state whether the proponent contacted the Town of Savoy or surrounding towns to determine whether any adverse impacts will occur on significant historical, recreational and cultural resources.~~
- If the project site is used for recreational purposes, the EENF should contain a discussion of the measures proposed to protect the safety of the public.

Alternatives

The EENF briefly discusses a project alternative and two different turbine transportation routes. The EENF states that the five turbine system, although 80 feet taller than the original seven turbine system, will decrease visual impacts, lessen land disturbance, and increase generation capacity.

The EENF also included a discussion of transportation route alternatives. One alternative would be to use Adams Road through Savoy State Forest, but this option would have potential wetland impacts and require rebuilding of a degraded road. A second alternative would be to use Black Brook Road, but this would require the replacement of a bridge, an expense the proponent was not willing to assume.

- The EENF lacked any meaningful discussion about alternatives, such as varying the location, height and number of wind towers on site as a means of avoiding or mitigating adverse impacts.
- The EENF does not contain an analysis and discussion of any alternative sites.

Other

- We recommend that no local permit public hearings be closed prior to the completion of the MEPA review process.

**Berkshire Regional Planning Commission
Clearinghouse Review Report**

COMMENTS AND RECOMMENDATIONS:

As a preliminary matter, the Commission is charged with performing technical reviews of projects under MEPA. These comments should not be taken as an endorsement or approval of wind energy projects of this magnitude in Berkshire County.

The purpose of MEPA is to “provide meaningful opportunities for public review of the potential environmental impacts for which Agency Action is required...” 301 CMR 11.00 (1). The EENF as submitted does not provide a meaningful opportunity for public review as required. A meaningful opportunity for review of a project cannot occur when the proponent fails to provide details or plans of anticipated environmental impacts and then claim that such plans or details will be worked out at a later date thereby circumventing a complete and adequate MEPA review of the project. It is the proponent’s responsibility to provide detailed information about the project’s anticipated environmental impacts and proposed mitigation measures. The proponent has failed to provide adequate details in the EENF, as discussed below, to enable meaningful public review of the Minuteman Savoy Wind Project.

The Commission would like to take this opportunity to voice its concern about an emerging and troubling pattern of MEPA filings for wind energy projects in Berkshire County concerning project segmentation. For example, the land disturbance calculations for Berkshire Wind and Hoosac Wind have increased substantially since their first ENF filings. It is understandable that as a project develops and evolves land disturbance and other calculations may vary. However, projects submitted for MEPA review should be at a sufficient level of design to provide an accurate and realistic snapshot of the anticipated environmental impacts and proposed mitigation measures. Proposed wind farms, such as the Minuteman Savoy Wind Project, are enormous projects and as such should be thoroughly scrutinized. A thorough MEPA review is best accomplished when all environmental impacts, both on-site and off-site, and proposed mitigation measures are fully documented, understood and considered at one time.

In 2004, the Berkshire Regional Planning Commission approved Wind Power Policy Siting Guidelines that sets forth the position of the Commission on MEPA reviews for wind energy projects. The Commission believes that a complete EENF should be required for all wind energy projects over 100’ in height. The Wind Power Policy provides standards that an EENF should meet in order to be considered “complete.” In accordance with these standards, the Commission finds that the EENF appears [inadequate](#) for the MEPA process because it is impossible to determine the total level of impacts based on the level of information submitted.

Standard (a) A detailed site plan showing all access roads, pad sites, accessory generating structures, power lines, wetland resources, wetland mitigation areas (if any), rare species habitat, stormwater controls.

- The discussion of stormwater control measures is inadequate to determine whether the standards of the Massachusetts Stormwater Management Policy have been met or whether nearby wetlands will be adequately protected and stormwater adequately managed.
- The discussion of measures to mitigate or avoid impacts to wetland and wetland buffer zones is wholly inadequate.
- The supplemental materials were not adequate to determine if the wetland replication will meet the requirements of the Wetland Protection Act.

Standard (c) A wildlife habitat assessment, including assessment of impact to migratory, resident and breeding avian and bat populations.

**Berkshire Regional Planning Commission
Clearinghouse Review Report**

- The EENF did not include an on-site assessment to determine the risk to bats and nocturnal birds.

Standard (e) A visual impact assessment, including pre- and post-construction photo simulations of the project as seen during the day and at night.

- The EENF did not include nighttime simulations with anticipated FAA required lighting.
- As a part of the visual impact assessment, the EENF lacked any plans or discussion of measures to avoid or mitigate shadow/flicker impacts on nearby residences.

Standard (f) Alternative sites analysis.

- The EENF lacked any meaningful discussion about project alternatives that take into account varying the location, height and number of wind towers on site as a means of avoiding or mitigating adverse impacts.
- The EENF lacks a sufficient discussion about alternative sites.

For the reasons stated above, the Commission takes the following position:

- 1. The Commission requests that the Secretary require the proponent to submit an EIR with a much greater level of detail and containing additional information, or**
- 2. The proponent withdraw the current EENF and resubmit a subsequent EENF with a much greater level of detail and additional information. The EENF as submitted does not provide a meaningful opportunity for public review as required.**

If the Secretary elects to require an EIR, the Commission recommends the following information be included in the EIR.

- A detailed alternatives analysis that provides a comparison of several different alternatives and the anticipated impacts each would create.
- An analysis of the visual impact of the project, including views of the hilltop at dusk and dawn ~~night~~ showing the required FAA lighting.
- Multiple detailed viewshed analyses, not limited to the Town of Savoy and the immediate surrounding area, which identify roads, public places and historical/cultural/recreational areas.
- Document and describe the anticipated impacts on Article 97 lands.
- A detailed action plan to mitigate or avoid shadowing/flickering impacts on affected residences.
- A final transportation route that the proponent proves to be feasible (turning radii, bridges, culverts) that includes all necessary state and local approvals and detailed site plans for all anticipated improvements whether on public or private property.
- Additional calculations for all off-site disturbed land and wetland impacts including all roads to be constructed or modified and anticipated intersection improvements.

Berkshire Regional Planning Commission Clearinghouse Review Report

- An independent and more thorough Phase I Avian Risk Assessment and additional bird assessments conducted in coordination with federal and state wildlife agencies, which among other things study the effect of FAA required lighting on avian species.
- The findings from an on-site bat and nocturnal bird impact analysis to determine the risk to bats and nocturnal bird species from the project.
- A monitoring plan and contingency plan to identify and mitigate any adverse impacts to wildlife, birds and bats should they occur.
- An independent and more thorough noise assessment with an in-depth discussion on the effects the proposed wind turbines will have on the public health.
- Plans in greater detail showing the improvements to be made at each intersection on the proposed transportation route. ~~in Savoy and other intersection improvements outside of Savoy.~~
- Detailed construction plans for both on-site and off-site improvements that include:
 1. construction limits; and
 2. sediment and erosion controls.
- A detailed description of the stormwater management controls both during construction and after construction as a permanent measure, which demonstrates that stormwater is being managed to meet the requirements of the Wetlands Protection Act and the MA Stormwater Management Policy.
- An erosion and sediment control plan which includes frequent monitoring during all phases of construction to insure that the erosion control devices function properly.
- A more detailed description of the wetland and Riverfront Area impacts and measures to protect these resources.
- A detailed plan to replicate impacted wetlands in accordance with the Wetlands Protection Act, which is consistent with the *Massachusetts Inland Wetland Replication Guidelines* (2002) and the *Massachusetts Wildlife Habitat Protection Guidance for Inland Wetlands* (2006).
- A detailed plant list for wetland replication, a monitoring plan to determine the success of the wetland replication and a plan to address invasive species through monitoring and eradication (should invasive species become established).
- A plan to prevent the introduction of invasive species, which includes alternatives to hay bales such as silt-fencing and straw-baling to reduce the risk of the inadvertent introduction of invasive species.
- Draft operation plans to manage the anticipated impacts on each municipality that will be affected by the transportation and construction of this project. Such plans should deal with traffic, road closures, emergency services and compensation to each municipality for any costs incurred and damage caused.

**Berkshire Regional Planning Commission
Clearinghouse Review Report**

The Berkshire Regional Planning Commission Executive Committee endorsed these comments at their meeting on ~~March 11~~April 8, 2010.