

March 7, 2012

Nantucket Energy Study Committee
Town of Nantucket
22 Federal Street
Nantucket, MA 02554

Dear Nantucket Energy Study Committee:

I am writing in response to your request for clarification regarding the purpose of the Massachusetts Clean Energy Center's Acoustic Methodology in order to address concerns raised by residents in an email dated March 1st, 2012 to the Town of Nantucket Board of Selectmen regarding the resolution of conflicting acoustical study data for the proposed Madaket wind turbine.

First, I would like to clarify MassCEC's mission and role. The Massachusetts Clean Energy Center is a quasi-public agency dedicated to promoting responsibly-sited wind energy development. We are not a regulatory agency and so do not exert any control over the approval process for wind projects. As described below, we do however have some analysis requirements and standards that apply to work that either we fund or that is prepared in support of funding applications to MassCEC. We do this to ensure (1) that studies we fund are comprehensive and (2) that analysts use consistent and appropriate methodologies in their work. This allows all parties to have more confidence in the analyses and to better understand the pros and cons of a particular project.

With respect to acoustics, MassCEC has required and funded pre-construction studies for many years, although until recently there has not been a consistent methodology for conducting these studies. In order to ensure that these studies are being done in a consistent manner and with a high degree of conservatism, MassCEC worked with acoustic experts through a rigorous process to develop a standard methodology that could be used for conducting acoustic studies funded through MassCEC. To reiterate, we require acoustic studies to follow this methodology (1) if they are done with MassCEC funding or (2) if they are done to support a funding application to MassCEC. These are MassCEC programmatic requirements, not regulatory requirements.

The purpose of MassCEC's Acoustic Methodology, as stated in the Methodology document, is *"to establish a standardized methodology for conducting acoustic studies for projects that*

receive or request technical or financial support from MassCEC.” The Methodology further states that it, “is intended to be compatible with the Massachusetts Department of Environmental Protection’s (MassDEP) noise regulation. However, the methodology is not intended in any way to alter, substitute, create, or enforce any policy or regulation that is in force or may be developed by MassDEP or any other regulatory agency. While this methodology is intended to assist project developers anticipate whether a project will comply with MassDEP’s noise regulation, following this methodology in itself does not constitute or guarantee compliance with MassDEP’s noise regulation.”

I would also like to provide more detail on the process that was followed to develop the Acoustic Methodology. MassCEC spent nearly a year researching and developing the Acoustic Methodology with the assistance of highly qualified acoustic experts. In addition, the Methodology went through a rigorous external review process, whereby several acoustic experts reviewed draft versions of the Methodology and provided comments. The firms that participated in the external review are:

- Mark Bastasch (Project Manager/Acoustical Engineer, CH2MHill)
- Mike Bahtiarian (Vice President, Noise Control Engineering, Inc.)
- James Barnes (Supervisory Consultant, Acentech) & Eric Wood (Principal/Director of Noise and Vibration Group, Acentech)
- Ken Kaliski (Managing Director of Environment, Energy & Acoustics, Resource Systems Group Inc.)

These are highly qualified experts who are well-respected within their field. Their comments have been documented and can be made available upon request. In addition, MassCEC also worked with the Massachusetts Department of Environmental Protection to ensure that the Methodology is compatible with state noise regulations and methodologies for establishing post-construction compliance. MassCEC’s acoustic methodology is also intentionally conservative, as it strives to ensure that projects that are expected to meet regulations under the Acoustic Methodology do actually meet state noise standards once operational.

I would also like to address the following comment that was made regarding MassCEC’s efforts to assist the Town by providing funding for a third party review of the existing reports:

“During the last week, in a series of emails, it became clear that the deck of cards to be dealt by the MA CEC was stacked in favor of the Town Energy Committee advocates for the installation of the Madaket wind turbine. All but one of the proposed ‘independent third party’ reviewers are Pro-Wind Board Members or reap significant business revenues from Turbine installation advocates. Further, MA CEC was controlling the scope and design of the project, impacting the

'story line' which would result. MA CEC would pay because the Town was out of money. But MA CEC would call the shots."

MassCEC has agreed to provide funding for acoustic consulting services in response to a request from the Town to address concerns raised by residents that the original Atlantic Design acoustic study was not done according to MassCEC's current methodology. MassCEC realizes that studies conducted prior to the implementation of the Acoustic Methodology may not be consistent with this methodology and offered to provide the Town with a third party review of their study to help them determine how closely the study followed the spirit of the Acoustic Methodology so that this concern could be addressed. The Town of Nantucket also requested that the third party reviewer also evaluate the Rand Ambrose Advisory Letter of February 1, 2012 as this letter was being frequently cited in relation to estimated noise impacts of the Madaket wind turbine. MassCEC agreed that it would be useful for the Town to have a third party review both documents to provide guidance to the Town.

We offered the Town two options for MassCEC funding of the third party review. We could provide a grant to the Town, which could then select its own consultant and enter into an appropriate contract. Or, MassCEC could contract with and pay a consultant directly. The Town chose the second option. We have several pre-qualified acoustic consultants that responded to an open request for proposals in which statements of qualifications were thoroughly evaluated by MassCEC staff for technical expertise. Consultants were selected due to their high level of acoustic expertise. All of the selected firms are very active in their field and have solid professional reputations. We fully expect that any of the firms can and will provide unbiased services to the Town. Further, we note that the scope of this third party review does not call for general opining on wind turbine acoustics but rather focuses on evaluating the technical merits of the monitoring, modeling, and analysis. All statements of qualifications for these consultants have been forwarded on to the Town for their review as well. MassCEC is confident that any of its pre-qualified consultants will provide professional acoustic expertise to the Town.

Please feel free to contact me if you have any additional questions about MassCEC's Acoustic Methodology.

Sincerely,



Leigh Cameron
Project Coordinator
Massachusetts Clean Energy Center