



Commonwealth of Massachusetts

# Division of Fisheries & Wildlife

**MassWildlife**

Wayne F. MacCallum, *Director*

22 October 2010

Ian A. Bowles, Secretary  
Executive Office of Energy & Environmental Affairs  
Attention: MEPA, Deirdre Buckley, EEA No.14647  
100 Cambridge St.  
Boston, Massachusetts 02114

*Project Name:* Douglas Woods Wind Farm  
*Proponent:* American Pro Wind, LLC  
*Location:* Webster Street – Route 16, Douglas  
*NHESP File Number:* 08-24315

Dear Secretary Bowles:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (NHESP) has reviewed the Douglas Woods Wind Farm Environmental Notification Form (ENF), and would like to offer the following comments regarding state-listed species and other wildlife.

Although the proposed wind project site is not currently mapped as Priority Habitat for state-listed species, three state-listed species have been observed in the vicinity: Eastern Box Turtle, Wood Turtle, and Marbled Salamander. These species are protected pursuant to the Massachusetts Endangered Species Act and its implementing regulations (MGL c. 131A, 321 CMR 10.00). As turtles are long-lived species with delayed reproduction, even small increases in adult mortality can negatively impact populations. Because state-listed species may be found outside of mapped Priority Habitat, we recommend that the Proponent be required to develop a plan to minimize risk of direct turtle mortality during land clearing and construction. We also recommend that the project be designed so as to minimize forest clearing in the vicinity of vernal pools and potential vernal pools, that may provide important habitat for the Marbled Salamander and other wildlife. Finally, we recommend that the proponent be required to conduct post-construction bird and bat mortality monitoring and that monitoring protocols be provided to the NHESP for review, prior to implementation.

If you have any questions about this letter, please contact Jon Regosin, Ph.D. at (508) 389-6376. We appreciate the opportunity to comment on this project.

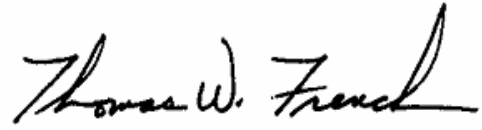
[www.masswildlife.org](http://www.masswildlife.org)

Division of Fisheries and Wildlife

Field Headquarters, One Rabbit Hill Road, Westborough, MA 01581 (508) 389-6300 Fax (508) 389-7891

*An Agency of the Department of Fisheries, Wildlife & Environmental Law Enforcement*

Sincerely,

A handwritten signature in black ink that reads "Thomas W. French". The signature is written in a cursive style with a large, sweeping initial 'T' and 'F'.

Thomas W. French, Ph.D.  
Assistant Director

cc: American Pro Wind, LLC  
Doug Vigneau, VHB, Inc.  
Douglas Conservation Commission  
Douglas Planning Department  
DEP Central Regional Office