



**AUDUBON SOCIETY
OF NEW HAMPSHIRE**

STATEWIDE OFFICES

3 Silk Farm Road Concord, N.H. 03301
PHONE 603-224-9909
FAX 603-226-0902
asn@nhaudubon.org
www.nhaudubon.org

REGIONAL CENTERS

**AMOSKEAG FISHWAYS
LEARNING CENTER**

Fletcher Street
Manchester, N.H. 03105
PHONE 603-626-3474
FAX 603-644-4386

*Managed by ASNH in partnership
with PSNH, the N.H. Fish and
Game Department, and the U.S.
Fish and Wildlife Service.*

**LOON PRESERVATION
COMMITTEE**

P.O. Box 604, Lees Mills Road
Moultonborough, N.H. 03254
PHONE 603-476-5666
FAX 603-476-5497

A self-funded project of ASNH.

**MASSABESIC
AUDUBON CENTER**

26 Audubon Way
Auburn, N.H. 03032
PHONE 603-668-2045
FAX 603-668-3796

**NEWFOUND
AUDUBON CENTER**

North Shore Road
East Hebron, N.H. 03222
PHONE 603-744-3516
FAX 603-744-1090

**PRESCOTT FARM
AUDUBON CENTER**

888 White Oaks Road
Laconia, N.H. 03246
PHONE 603-366-5695
FAX 603-366-5720

**SILK FARM
AUDUBON CENTER**

3 Silk Farm Road
Concord, N.H. 03301
PHONE 603-224-9909
FAX 603-226-0902

February 27, 2009

Mr. Richard Roach
U.S. Army Corps of Engineers
696 Virginia Road
Concord, MA 01742

Dear Mr, Roach,

I am writing in reference to the application of Granite Reliable Power, LLC for a certificate for site and facility for a wind energy installation in Coos County, New Hampshire (NH SEC Docket 2008-04). In the interests of full disclosure, our staff biologists conducted breeding bird surveys at the project site in contract with Noble Environmental Power during the summer of 2007. A clause in the contract specifically reserved our right to comment on the proposed project once the application was submitted.

The Audubon Society of New Hampshire is a statewide non-profit organization dedicated to the conservation of wildlife and habitat throughout New Hampshire. Our organization supports appropriately sited wind turbines as one component of New Hampshire's renewable energy portfolio. We consider appropriate siting to include avoidance of substantial impacts to sensitive habitats and species of conservation concern. This project's proposed turbines on Dixville Peak, northern Owlhead Mountain, and especially on Mt. Kelsey fail to meet these criteria.

We strongly encourage the Corps of Engineers to require an Environmental Impact Statement as part of the Section 404 permitting process for this proposed project. The permit application states that there will be 58 acres of impact above 2700 ft. elevation. This level of impact alone is reason for concern. However, to date there has been no comprehensive geotechnical analysis for the routes of proposed roads at these elevations. The soils and topography of these areas suggest that significant terrain alteration will be needed to construct these roads. Fulfillment of curve radius and grade requirements will involve significant cuts and fills, including blasting. These terrain alterations will lead to as yet unidentified impacts to both surface and groundwater hydrology.

The December 2008 testimony of Dr. George Mariani highlights the significant increases in projected acreage of land disturbance and wetlands impacts from the initial SEC application in July to various October permit applications. We believe that actual acreages of proposed impacts have

not been adequately assessed to date, and are likely to exceed current projections. Dr. Mariani's testimony also outlines a number of measures to improve the plan for water quality protection and to monitor its implementation. We strongly urge that the Corps consider these recommendations, including pre-construction baseline surveys, as conditions of any Section 404 permit for this project.

Testimony of Dr. Gary R. Sanford details wetland impacts associated with proposed high elevation turbines and expresses concerns about the overall net loss of wetland values associated with this project. We urge the Corps to take these concerns seriously in evaluating the Section 404 permit application. Dr. Sanford's supplemental testimony of February 2009 outlines opportunities to reduce wetlands impacts, including steeper side slopes and use of hard engineering measures. Such measures demand a close analysis by your agency to assess their appropriateness in this setting and the attendant environmental impacts of these mitigation measures.

In summary, the Audubon Society of New Hampshire holds significant concerns regarding wetlands and water quality impacts of the proposed Coos County wind energy project. We strongly urge the Corps to require an Environmental Impact Statement that fully documents the areas and associated depths of blasting required; the complete footprint of the project's roads, including side slopes; and a comprehensive analysis of ground and surface water impacts.

Sincerely,



Michael J. Bartlett
President

Cc: Thomas Burack, DES
Tom Chapman, USFWS
Kathleen Keene
Kenneth Kimball, AMC
Lisa Linowes
Peter Roth, NH AGO
Steve Weber, NHFG
Mark Zankel, TNC