

**THE STATE OF NEW HAMPSHIRE  
BEFORE THE  
NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

**DOCKET NO. 2010-01**

**APPLICATION OF GROTON WIND, LLC  
FOR A CERTIFICATE OF SITE AND FACILITY**

**PREFILED DIRECT TESTIMONY OF CASINO CLOGSTON  
ON BEHALF OF  
THE TOWN OF PLYMOUTH, NEW HAMPSHIRE  
August 2010**

**Qualifications.**

**Q. Please state your name and business address.**

A. My name is Casino Clogston. My business address is 42 Highland St., Plymouth,  
NH 03264.

**Q. Who is your current employer and what position do you hold?**

A. I am employed by the Town of Plymouth as its Fire Chief.

**Q. Please describe your background and qualifications.**

A. I have 20 years of service with the Town of Plymouth as a full time firefighter.  
Within that time I have attended multiple firefighting classes at the NH Fire Academy.

These classes range from basic firefighting skills to fire officer 1 and 2. With this training I have moved through the ranks. I am also a special deputy warden and I am Plymouth's Forest Fire Warden with the Department of Economic Resources.

**Q. Please describe your current employment responsibilities.**

A. As Plymouth's Fire Chief, I have management responsibility for firefighting response, ambulance response and fire safety inspection within the Town of Plymouth. Plymouth also provides contractual ambulance response to the neighboring communities of Rumney, Holderness, Ashland and a portion of Bridgewater. Plymouth also provides fire response by mutual aid agreements to neighboring communities. Plymouth has the largest fire department in the area. Fire response includes not only structure fires but also responses to brush and forest fires.

**Q. How do your current responsibilities bear upon the Groton Wind Project?**

A. Accompanying my prefiled testimony are photographs (Exhibit 1) that have been supplied to me by the New Hampshire State Fire Marshal's Office. The photos illustrate the fire safety danger that can arise from the installation of wind energy turbines. Plymouth's Eagles Nest Condominium Project is one of the closest residential neighborhoods to the subject property. Plymouth has the largest fire department in the area and could be called upon to respond to a site fire, forest fire, or ambulance calls at

the site. My obligation is to make sure that my responding firefighters and EMTs can execute their responsibilities as safely as possible, that they have satisfactory training to be able to respond to this site in a safe and efficient manner and that public safety is protected by having an emergency response and firefighting plan that addresses the introduction of this use into a wild land setting.

**Purpose of Testimony**

**Q. What is the purpose of your testimony?**

A. The purpose of my testimony is to address the requirements for public safety response, coordination, management and resources, such that I, the Groton and Rumney Fire Chiefs, and the jurisdictional forest rangers will be in a position to state with confidence to the Committee and to the public that we have the resources, training and capabilities to respond to any type of fire or ambulance response incidents that may occur at this remote site.

**Q. Have you met with the neighboring fire chiefs and forest ranger to discuss your collective public safety concerns about this proposed project?**

A. Yes. Roger Thompson, the Groton Fire Chief, Ken Ward, the Rumney Fire Chief, and Bert Van Dohrmann, the Forest Ranger with jurisdiction for this area have met

recently. We discussed the potential wild land public safety issues that may be presented by the introduction of the proposed windmills into this area, along with the resources and training that would be needed to battle a wild land fire. We also discussed the preparation and implementation of a fire response plan; to the extent that technicians on the site would have training in fire suppression; whether the site alarm system would be compliant with NFPA-72; the desirability of a radio box connecting directly to Lakes Region Dispatch for purposes of reporting fires; how the applicant would manage or contract for the provision of ambulance service to the site; whether the site would be staffed with a safety officer during construction; and, the importance of response time in the event of a fire or ambulance call.

**Q. Have you and the other fire chiefs and the forest ranger discussed the types of additional resources that you would need to respond to a wild land fire in this area?**

A. Yes. We believe that two Type 6 brush trucks, two six-person ATVs, six forestry high pressure portable pumps, and related equipment to make these complete (hose, helmets and nozzles), along with appropriate training would allow the departments to respond to a wild land fire in this remote area. The equipment would be divided between the Rumney and Plymouth Fire Departments.

**Q. Have you informed the company representatives that the Fire Chiefs and Forest Ranger would like to have a meeting with company officials to discuss these requests for additional equipment resources, training, preparation and implementation of a fire response, and the other issues mentioned in your testimony, so that the local fire and forest officials and the company can address how the local fire and ambulance services can best meet the public safety needs created by the introduction of this use into this remote mountainous area?**

A. Yes

**Q. Have you received a commitment from the applicant to make these resources available?**

A. As of this date, the applicant has provided no response to our public safety requests for materials, training or planning.

**Q. At this time, are you in a position to reassure either the committee or the public that the application has addressed the public safety issues raised in your testimony today?**

A. No. The Applicant has not satisfied my public safety concerns and those that have been expressed by the other fire chiefs and the forest ranger.

**Q. In your opinion, will the project have an unreasonable impact upon public health and safety if these issues remain unaddressed?**

A. Yes, I believe the project will have an unreasonable impact on public health and safety unless all of these issues are addressed to the collective satisfaction of the fire chiefs and the forest ranger.

**Q. Does this conclude your testimony?**

A. Yes.



