



NH DEPT. OF  
ENVIRONMENTAL SERVICES

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*Celebrating 100 years of New Hampshire's working forests*

December 6, 2010

Thomas Burack, Chairman  
Site Evaluation Committee  
New Hampshire Department of Environmental Services  
29 Hazen Drive  
Concord, NH 03302

Re: Groton Wind, LLC (SEC Docket No. 2010-01)

Dear Chairman Burack

The New Hampshire Timberland Owners is a landowner membership and forest products industry trade association representing New Hampshire's entire forest products industry and timberland owners. Our members own and manage over 1 million acres of timberland in New Hampshire. These lands provide clean water, clean air, wildlife habitat and recreational opportunities for the state's citizens. The NHTOA has been following the proceedings of the Site Evaluation Committee's review of the Groton Wind, LLC's proposed project (SEC Docket No. 2010-01) and felt it necessary to provide our perspective.

Although these comments do not address the utility and power benefits wind energy provides (carbon neutrality, indigenous power, etc.), these comments only speak to how wind energy projects can impact timberland management.

The NHTOA recognizes each wind energy project is unique and it is the task of the New Hampshire Site Evaluation Committee and state regulatory agencies to consider these factors through the licensing and permitting process. But, in general, wind energy projects can benefit a timberland owner's ability to retain their working forest and manage it. Wind energy projects do this through two means, alternative revenues and roads/infrastructure.

#### **Alternative Revenues**

As the economic model for timberland ownership becomes increasingly difficult, the ability to capture revenue from the sale of "wind rights" can make the difference between a landowner being able to retain their timberland property as a working forest or having to subdivide and sell it. And, we expect alternative revenues such "wind rights" will become more important as traditional markets for forest products (saw logs, pulpwood and wood chips) remain uncertain.

**NEW HAMPSHIRE TIMBERLAND OWNERS ASSOCIATION**  
54 PORTSMOUTH ST., CONCORD, N.H. 03301  
PHONE (603) 224-9699 • FAX (603) 225-5898 • WWW.NHTOA.ORG

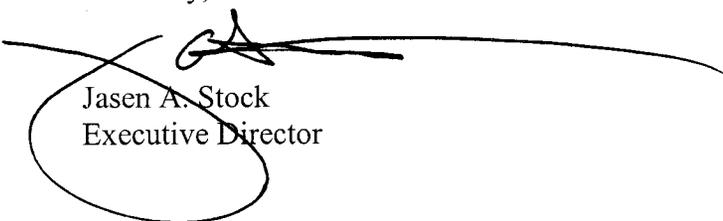
### **Infrastructure**

From forest operations perspective, wind energy projects are compatible and in some instances complimentary to forest management activities. Specifically, the road and access infrastructure needs of a wind power project can be setup to compliment timber and wildlife management needs (timber harvest layout, access to fields for mowing, access for wildfire control, etc.) Also, these access roads can expand the recreational opportunities for a property as they can serve as recreational trails for motorized and non-motorized use and they provide access for hunters and fishermen.

Although wind energy projects are not suitable for all locations or landowners, these projects do provide an opportunity for some timberland owners to retain their property as a working forest open to multiple uses. In the case of the referenced project, assuming it meets all the regulatory permits and statutory requirements it appears the proposed project would compliment the property's forest management activities and recreational uses. This will help enable the landowner to retain this property as a working forest – something that will benefit the local economy and environment.

Thank you for the opportunity to provide these comments. If you have any questions please contact me.

Sincerely,



Jasen A. Stock  
Executive Director

CC: Michael Iacopino