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July 11, 2012

**Via U.S. and Electronic Mail**

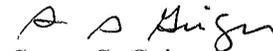
Ms. Jane Murray, Secretary  
New Hampshire Site Evaluation Committee  
N.H. Department of Environmental Services  
29 Hazen Drive  
Concord, NH 03302-0095

**Re: *Docket 2012-01 - Application of Antrim Wind Energy, LLC  
for a Certificate of Site and Facility for a Renewable Energy Facility***

Dear Ms. Murray:

Enclosed for filing with the New Hampshire Site Evaluation Committee in the above-captioned matter please find an original and 9 copies of Applicant's Response to The Audubon Society of New Hampshire Motion to Compel Responses to Data Requests. Please contact me if there are any questions about this filing. Thank you.

Very truly yours,

  
Susan S. Geiger

Enclosures

cc: Service List, excluding Committee Members  
Clark A. Craig, Jr. (by first class mail)  
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**THE STATE OF NEW HAMPSHIRE**

**SITE EVALUATION COMMITTEE**

**Docket No. 2012-01**

**Re: Antrim Wind Energy, LLC**

**APPLICANT'S RESPONSE TO  
THE AUDUBON SOCIETY OF NEW HAMPSHIRE  
MOTION TO COMPEL RESPONSES TO DATA REQUESTS**

NOW COMES Antrim Wind Energy, LLC ("AWE" or "the Applicant"), by and through its undersigned attorneys, and responds to the Motion to Compel filed by the Audubon Society of New Hampshire ("ASNH") by stating as follows:

1. ASNH Data Request 1-7 seeks the ambient sound levels at the eastern shore of Willard Pond and along the northern property line of ASNH's Sanctuary. The Applicant responded in writing that no ambient sound level measurements were taken at those two locations, and that given their distance from any major roads, it is expected that the ambient sound levels at those locations would be similar to those measured on Salmon Brook Road. ASNH's Motion to Compel suggests that the ambient sound levels at ASNH's Sanctuary may be lower than those measured by the Applicant's sound expert at the Salmon Brook Road location ("L3"), and asserts that the protection of the quiet enjoyment of the natural environment at the Sanctuary warrants careful consideration and protection of current ambient sound levels there. The Motion also asserts that Willard Pond, within the Sanctuary, is open to the public and that other than electric powered boats, motor boats are prohibited there.

2. The Applicant objects to conducting additional sound monitoring, as it believes that its existing sound studies are adequate and appropriate, and because, indicated above, the ambient sound levels at the ASNH locations would not differ greatly than those measured at L3/Salmon Brook road. In addition, AWE's sound modeling demonstrates that the sound levels at Willard Pond that are expected to be produced by the Project are in the acceptable range of 30-35 dBA. *See* Application, Appendix 13A, Figure 7-1. This result will not change if current background sounds are measured. Further, given that existing background noise at Willard Pond will include electric motorized boats, and because the area is not used at night, it is neither logical nor reasonable to conduct the additional ambient sound studies requested by ASNH. Notwithstanding this objection, the Applicant would not object if Counsel for the Public's sound consultant's scope of work were to include sound monitoring at the two locations requested by ASNH.

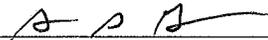
3. During the technical session held June 29, 2012, ASNH requested that the Applicant conduct 2 visual simulations – one from Goodhue Hill, which is within the Sanctuary, and one from an area near the summit of Robb Mountain which is within property under a conservation easement held by ASNH. The Applicant objects to conducting these visual simulations because it believes that those presented in its Application are adequate and appropriate to support a finding that the Project will not have an unreasonable adverse effect on aesthetics. Moreover, the Applicant believes that visual simulations from Goodhue Hill and Robb Mountain are unnecessary as the views from those locations are similar to those from Bald Mountain, which is the subject of a visual simulation submitted with the Application. Notwithstanding these objections, the

Applicant would not object if Counsel for the Public's visual consultant's scope of work were to include two visual simulations requested by ASNH.

WHEREFORE, in view of the foregoing, the Applicant respectfully requests that the Committee:

- A. Deny NHTSA's Motion to Compel; and
- B. Grant such further relief as it deems appropriate.

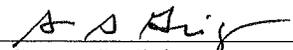
Respectfully submitted,  
**Antrim Wind Energy, LLC**  
By its Attorneys,  
Orr and Reno, P.A.

By:   
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Dated: July 11, 2012

Certificate of Service

I hereby certify that on this 11th day of July, 2012, a copy of the foregoing Response was sent by electronic mail or U.S. Mail, postage prepaid, to persons named on the Service List of this docket, excluding Committee Members.

  
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Susan S. Geiger