

January 10, 2014

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

**RE: SEC Docket No. 2013-02: Application of Atlantic Wind, LLC for a Certificate of Site and Facility for the Wild Meadows Wind Project**

Dear Commissioner Ignatius:

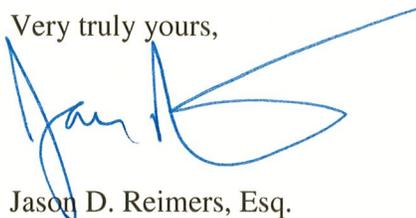
Enclosed for filing in the above-referenced docket, please find an original and 18 copies of the following pleadings:

1. Petition to Intervene of Society for the Protection of New Hampshire Forests;
2. Appearances of Attorneys Jason D. Reimers and Amy Manzelli; and
3. Partially Assented-to Motion of Society for the Protection of New Hampshire Forests to Suspend Deliberations and Time Frame Pursuant to RSA 162-H:6-a, IX.

We recognize that filing items 2 and 3 is contingent upon the decision of the Petition to Intervene.

Thank you for your attention to this matter. Please contact me if you have any questions about these filings.

Very truly yours,



Jason D. Reimers, Esq.

cc: Clients  
Michael J. Iacopino, Esq.  
Barry Needleman, Esq.  
Patrick H. Taylor, Esq.  
Sherilyn Burnett Young, Esq.  
Michael S. Lewis, Esq.  
Eric W. Macaux, Esq.  
Mary Maloney, Esq.



STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE

Docket No. 2013-02

Application of Atlantic Wind, LLC for a Certificate of Site and Facility  
for the Wild Meadows Wind Project

**PETITION TO INTERVENE OF  
SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS**

The Society for the Protection of New Hampshire Forests (the “Forest Society”), by and through its attorneys, BCM Environmental & Land Law, PLLC, respectfully petitions the New Hampshire Site Evaluation Committee (SEC) to intervene in the above-captioned proceedings pursuant to Site 202.11 and RSA 541-A:32, as follows:

1. On December 12, 2013, Atlantic Wind, LLC (“Atlantic Wind”), owner and developer of the Wild Meadows Wind Project (“Project”), filed an application to develop a 75.9 megawatt (MW) wind energy facility consisting of 23 wind turbines of 3.3 MW each, situated along ridgelines in Alexandria and Danbury, New Hampshire.
2. The Forest Society is a private, non-profit membership organization dedicated to protecting the state’s most important landscapes while promoting the wise use of its renewable natural resources.
3. The Forest Society has over 10,000 members and holds property interests in over 187,000 acres in New Hampshire.
4. Within a ten-mile radius of the proposed project’s approximate center point, the Forest Society holds property interests on twenty-two (22) parcels of land totaling 7,251 acres.

5. This includes thirteen conservation easements over which the Forest Society has a perpetual obligation for monitoring and enforcement, and nine fee-owned forest reservations which the Forest Society manages for natural resource protection, sustainable forestry, and public recreation.

6. The property boundary of one parcel, the Butman easement in Alexandria, is within one mile from the northern-most turbines in the proposed project, and the boundaries of several other parcels, including the Sudrabin Forest and Catterall Forest, are within 3 to 4 miles of proposed turbine locations.

7. As measured from the proposed project’s approximate center point, the following are the Forest Society’s holdings in the vicinity of the proposed project:

**5 Mile Radius**

<b>Property Name</b>	<b>Town</b>	<b>Protection Type</b>	<b>Acres</b>
Bliss Lane Realty Trust	Orange	Conservation Easement	493
Sudrabin Forest	Orange	Fee ownership	60
Butman	Alexandria	Conservation Easement	486
Victors Woods 1	Danbury	Fee ownership	262
Victors Woods 2	Smith River	Fee ownership	49
Thompson	Hill	Conservation Easement	136
Catterall Forest	Bristol	Fee ownership	199
Giles	Bristol	Conservation Easement	32
			1,717

**10 Mile Radius**

Hebron Town Forest	Hebron	Conservation Easement	450
Brown	Alexandria	Conservation Easement	110
Haffenreffer Forest	Enfield	Fee ownership	384
Grafton Pond Reservation	Grafton	Fee ownership	930
Walker	Danbury	Conservation Easement	196
Hope Forest	Danbury	Fee ownership	376
French #1	Wilmot/Springfield	Conservation Easement	467
Webb	Wilmot	Conservation Easement	950
Boyer	Hill	Conservation Easement	890
Robie Forest	Franklin/Andover	Fee ownership	500
Worthen	Bristol	Conservation Easement	118
Giles	Bristol	Conservation Easement	32
Tucker Forest	Enfield	Fee ownership	47
Lelchuk	Canaan	Conservation Easement	84
			<hr/> 5,534
22 parcels			<hr/> <hr/> 7,251

8. Amongst the sound, aesthetic, environmental, property value, economic, and other expected impacts of the project, the Forest Society and its members will be specifically impacted because of the proximity of the project to its real estate holdings.

9. Site 202.11(a) provides that “[p]ersons seeking to intervene in a proceeding shall file petitions with the committee . . . .” Site 202.11(b) provides that “[t]he presiding officer shall grant a petition to intervene if:

(1) The petition is submitted in writing to the presiding officer, with copies mailed to all parties named in the presiding officer’s order of notice of the hearing, at least three days before the hearing;

(2) The petition states facts demonstrating that the petitioner’s rights, duties, privileges, immunities or other substantial interests might be affected by the proceeding or that the petitioner qualifies as an intervenor under any provision of law; and

(3) The presiding officer determines that the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.”

See also RSA 541-A:32 (imposing identical standard by statute).

10. The Forest Society meets the requirements of Site 202.11(b).

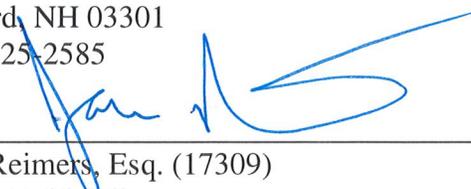
**WHEREFORE**, the Society for the Protection of New Hampshire Forests respectfully requests that that the designated Chairperson grants this petition to intervene in the above-captioned proceedings.

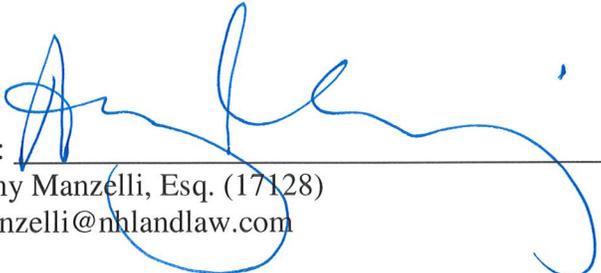
Respectfully Submitted,

**SOCIETY FOR THE PROTECTION OF NEW HAMPSHIRE FORESTS**

By its Attorneys,

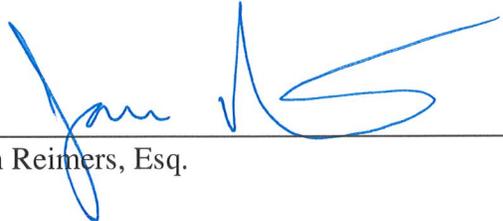
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Concord, NH 03301  
(603) 225-2585

By:   
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Jason Reimers, Esq. (17309)  
reimers@nhlandlaw.com

By:   
Amy Manzelli, Esq. (17128)  
manzelli@nhlandlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, January 10, 2014, a copy of the foregoing motion sent by electronic mail or U.S. Mail, postage prepaid, to persons named on the Service List of this docket.

By:   
Jason Reimers, Esq.