

State of New Hampshire
Site Evaluation Committee

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Robert R. Scott
Vice-Chair

September 25, 2019

VIA E-MAIL AND FIRST-CLASS MAIL

Jeff Nelson, Manager
TransAlta Corporation
Box 1900, Station "M"
110 – 12th Avenue SW
Calgary, Alberta
T2P 2M1

**Re: SEC Docket No. 2015-02—Antrim Wind Energy LLC
Response to Correspondence Regarding Tree Planting at Site Entrance**

Dear Mr. Nelson:

On March 17, 2017, the Site Evaluation Committee (Committee) issued an Order and Certificate of Site and Facility with Conditions (Certificate) to Antrim Wind Energy LLC (AWE) to site, construct, and operate the above-referenced Project.

On September 4, 2019, AWE submitted a letter (Attachment 1) regarding certain post-construction tree plantings shown on Sheet C-1 of the permit drawings near the site entrance.¹ The tree plantings are also referenced in the Visual Assessment provided in the Application² and are described as a visual screen to reinforce the remaining vegetative buffer along Route 9, for the almost 2-acre staging area that was to be cleared to the north of the substation and the O&M facility. In the letter, AWE stated that its contractor never cleared the permitted 2-acre staging area and that a denser and more mature vegetative screen exists from the natural forest that remains there and that the tree plantings should, therefore, be omitted.

On July 26, I conducted a site visit with DES personnel and among other things, observed that the 2-acre staging area that was to be located between Route 9, and the Project substation had not been cleared, that the substation was not visible from Route 9, and that mature natural vegetation remained.

Based upon my review of the information provided as well as my field observations, omitting the tree planting will not impact aesthetics, historic resources, air or water quality, the natural environment, public health and safety, and the orderly development of the region. This determination is based solely on

¹ The tree plantings shown on sheet C-1 are in the certified record at App. Ex. 33, Appendix 7-A, Civil Design Drawings (page 1707) and App 35, Appendix 7A-2, Revised Civil Design Drawings (page 004322).

² The discussion in the Visual Assessment regarding the tree plantings is in the certified record at App. Ex. 33, Appendix 9A (page 001804).

the information provided and is not binding or determinative of any future findings or rulings by the Committee. Consistent with RSA 162-H:4, III, and the Certificate, this determination does not provide AWE with any relief to comply with permits and/or certificates issued by the Department of Environmental Services (Appendix I) and the permits and/or certificates issued by the Department of Transportation (Appendix III). Please file the amended civil or as-built drawings with the Committee reflecting this change.

If you have any questions, please contact me at (603) 271-2435, or via e-mail at pamela.monroe@sec.nh.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Monroe', with a long horizontal flourish extending to the right.

Pamela G. Monroe
Administrator

Ec: Jean-Francois Latour, TransAlta
Michael Iacopino, Brennan Lenehan

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September 4, 2019

New Hampshire Site Evaluation Committee
Attention: Pamela G. Monroe, Administrator
21 South Fruit St., Suite #10
Concord, NH 03301**Re: Antrim Wind Energy LLC – Tree Planting at Site Entrance**

Dear Ms. Pamela G. Monroe:

Antrim Wind Energy LLC is seeking the SEC's guidance/concurrence regarding AWE's position on the following matter.

On Sheet C-1 of the permit drawings (Exhibit 7A) there are a series of plantings shown near the site entrance. These same plantings were carried over into the IFC drawings by Sewall. These plantings are also referenced in the Visual Assessment by Landworks (Appendix 9A). Page 37¹ of that report states:

"There will be a staging area of less than 2 acres cleared to the north of the substation and O&M facility that will benefit from the existing buffer along Route 9, and 100 feet of vegetation will be retained along and parallel to the highway. Once construction is complete, this area will be allowed to revegetate naturally, which is often quicker and more effective than planting measures. To reinforce the buffer along Route 9, an area adjacent to the southern edge of the buffer and where clearing abuts the buffer, will be planted with a dense landscape screen of evergreen and deciduous trees. Additionally, some landscape plantings will be added to the entry area adjacent to the access road to close the opening and provide further screening of the facility (see Exhibit 19)"

As stated in the Visual Assessment excerpt, AWE's position is that the purpose of these plantings was to create a visual screen to counter the effect of clearing the 2-acre laydown yard on site. AWE's contractor never cleared that 2-acre laydown yard and therefore a dense natural forest still remains there, which is a more effective screen than replanting would have been and as a result the Antrim Wind facility is not visible from the road. Additionally, AWE does not believe it

¹ Page 43 of the PDF file: 10-02-15-sec-2015-02-appendix-9a-lw-va-final-03sept2015-w-exhibits.pdf



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is viable to successfully plant trees either in the forest or in the bedrock directly around the site entrance.

Because there currently exists a vegetative screen resulting from AWE clearing less area than permitted, which is denser and more mature than any replanting would have been, and because the facility is not visible from the road, AWE's position is that the need for the plantings shown on the plans no longer exists and that these tree plantings can be omitted. We respectfully request your concurrence on this position.

I would be happy to discuss further or answer any other questions you have.

Yours truly,

TRANSALTA CORPORATION

Jeff Nelson, P. Eng (Alberta)
Manager, Project Engineering | Construction & Development Engineering

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