

Southwest Region Planning Commission

37 Ashuelot Street, Keene, NH 03431

603-357-0557 Voice

603-357-7110 Fax

November 1, 2016

Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Antrim Wind Energy, LLC; Docket No. 2015-02

Dear Ms. Monroe:

Please accept this correspondence regarding the Antrim Wind Energy, LLC proposal. In conducting a review of the proposal, the focus is on regional impact rather than a more detailed review such as that provided for a site plan application.

In conducting this review, we reference the following: *Monadnock Region Future: A Plan for Southwest New Hampshire* (MRF), and the *Southwest New Hampshire Natural Resources Plan*. The following goals, objectives and strategies are applicable in this review and should be considered when making a decision regarding the proposal.

Goal II: A competitive and prospering regional economy will create diverse opportunities for current and future residents and workers.

Objective 2c. Maintain adequate infrastructure. (MRF, pg.87)

- vii. Support and develop an adequate, affordable, diversified energy supply including local resources such as biomass, solar, wind, etc.

Goal III: The Region's natural, historic, and cultural resources will be cared for and protected for the use and enjoyment of present and future generations.

Objective 3.b. Protect and conserve important resources. (MRF, pg. 89)

- i. Develop and implement conservation strategies that protect and manage the Region's natural resources such as prime agricultural soils, open space, important forest soils, shoreland areas, and wildlife habitat.
- xii. Expand access to renewable energy resources.

In reviewing the proposal in the context of the above, there is a balance that is needed to maintain the quality of the natural resource values that currently exist. As noted in the *Southwest New Hampshire Natural Resources Plan*, "Regional challenges associated with wind energy are largely related to the impact of wind development on scenic views and wildlife resources. The hill-tops and mountain ridges that are most suitable for generating larger scale wind power are also valued for their scenic beauty, recreational value, and natural resources. Some of the proposed sites for wind energy in the Region are also areas that support important wildlife habitat and critical flyways for migratory birds." (pg. 66).

Wildlife Habitat

A review of the *NH Wildlife Action Plan* map showing the Highest Ranked Wildlife Habitat by Ecological Condition indicates that the proposed site is an area classified as *Highest Ranked Habitat in the Biological Region* and some portion that is classified as *Highest Ranked Habitat in New Hampshire*. This area is resource rich lending itself to be a critical area for wildlife breeding and nesting. Disruption to this ecosystem could create an ecological domino effect therefore, careful management of the project should be required to ensure that the proper use of best management practices during all phases of the project.

Since the staging area is temporary, it is suggested that prior planning be done to minimize the amount of tree cutting and intrusion to the existing landscape. This should be located in an area that best fits within the natural resources (e.g. away from vernal pools, etc.), and not out of convenience for the project.

A forestry management plan should be required to ensure that best management practices are being utilized during all phases of this project. The plan should include the use of native, non-invasive species to revegetate areas that were temporary staging areas and access roads during construction. A mix of vegetation types should be used and include recommendations found in the *NH Wildlife Action Plan*, and *Ecosystems and Wildlife Climate Change Adaptation Plan*. This will help to provide for the changing habitat needs due to land use development and climate change.

Noise

Noise is a concern for the enjoyment of residential properties and recreational activities. Loss of tree cover, and noise can also change the migrating and nesting patterns of birds and wildlife of this area. Efforts should be made to mitigate these issues. Proper siting of the structures as well as the use of insulating materials and minimizing the blade surface should be considered and required as applicable to reduce noise to nearby homes and intrusion in wildlife habitat. Tree cutting should be kept to the least amount necessary throughout the project.

Visual Impact

Proper siting of development should be carefully considered to minimize visual impacts to the existing landscape and intrusion on the enjoyment of public and private land. This include steps needed to reduce the intermittent lighting effect known as “flicker effect”. This could include minimizing the blade surface to reduce the light cast to nearby homes.

Conservation Land

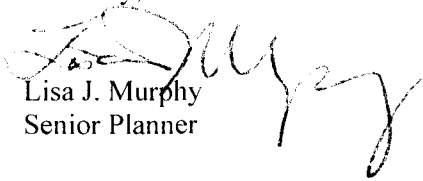
The proposal includes the conservation of 908 acres of land. Good land conservation does not end with the acquisition of the property or an easement. When property is placed in conservation it is important to plan for and identify resources to support long-term stewardship and management of the land. Stewardship responsibilities can include monitoring and enforcing the provisions of an easement, evaluating the appropriate use of a property (recreation, timber, harvesting, farming, etc.), and managing the impact of public use of the lands.

While this proposal addresses some of the goals and objectives of the *Monadnock Region Future* document, concerns exist regarding the potential impact to surrounding neighborhoods and wildlife habitat. Proper siting of turbines, access roads, and staging areas can be effective in minimizing negative impacts that are

often associated with this type of proposal and, therefore, we suggest that careful consideration be given in this regard.

Thank you for the opportunity to comment on this proposal. Please contact me if you have questions or would like to discuss further.

Sincerely,



Lisa J. Murphy
Senior Planner