

STATE OF NEW HAMPSHIRE

SULLIVAN, SS.

SUPERIOR COURT

Case No. 220-2020-CV-00112

Town of Lempster

v.

Kevin Onnela

Debra Onnela

Avangrid Renewables, LLC

and

Lempster Wind, LLC

AFFIDAVIT OF RYAN HALEY

NOW COMES Ryan Haley, upon oath, being duly sworn, and states as follows:

1. I have been employed by Lempster Wind, LLC (“Lempster Wind”) since 2010 and hold the position of Plant Manager.
2. I am familiar with the site of the Lempster Wind energy facility in Lempster, New Hampshire, the roads providing access to the wind turbines, and other buildings and structures comprising the Lempster Wind energy facility.
3. Entrances to the Lempster Wind energy facility site are located on Ridge Road and Bean Mountain Road, and both roads provide access points to the site of the Lempster Wind energy facility.
4. Lempster Wind’s vendors and visitors use Ridge Road to access the Lempster Wind energy facility site 100% of the time.

5. Representatives of Avangrid Renewables, LLC and Lempster Wind, and Kevin Onnela and Debra Onnela use both Ridge Road and Bean Mountain Road daily.
6. Bean Mountain Road is sometimes maintained in the winter.
7. The existing gates on Bean Mountain Road are instrumental and required to prevent the public from entering the site of the Lempster Wind energy facility because the trees and topography on either ends of those gates provide natural barriers to entry.
8. Removing the existing gates on Bean Mountain Road and replacing them with gates on Ridge Road where it intersects with Bean Mountain Road would be ineffective in preventing the public from entering the site of the Lempster Wind energy facility.
9. Because of the open areas in the vicinity of the intersection of Bean Mountain Road and Ridge Road, users of Bean Mountain Road would be able to circumvent gates installed on Ridge Road where it intersects with Bean Mountain Road, and to enter the site of the Lempster Wind energy facility.
10. The two attached photographs were taken by me on September 20, 2021 and show the open areas referenced in paragraph 9 above.
11. Photo 1, attached, shows the intersection of Ridge Road and Bean Mountain Road near where Lempster Wind's meteorological tower (fenced) and its Operations & Maintenance ("O&M") building and yard are located. Bean Mountain Road is directly behind the pile of logs shown in the foreground, and continues across Ridge Road, sloping to the right. The O & M building is in the background.
12. Photo 2, attached, was taken in the intersection of Ridge Road and Bean Mountain Road, and shows the wide spread of open fields in that area.

DATED this 21 day of September, 2021.

Ryan M. Haley
Ryan Haley

STATE OF NEW HAMPSHIRE
COUNTY OF Sullivan

On this 21 day of September, 2021, the above-named Ryan Haley personally appeared before me and subscribed and swore to the foregoing.

Linda Callahan
Justice of the Peace/Notary Public
My Commission Expires:





