



North Country Council, Inc.

Regional Commission & Economic Development District
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Thomas S. Burack, Chairman
Site Evaluation Committee
New Hampshire Department of Environmental Services
29 Hazen Drive
Concord, NH 03301

November 14, 2008

Re: Application of Granite Reliable Power, LLC, Docket No. 2008-04
Preliminary Comments of North Country Council

Dear Chairman Burack:

We have reviewed the material that has been provided to us by U.S. Mail, that which was provided by email in file sizes not over our ISP's file size limit, and that additional material which I was able to download from the SEC website and open. This did not include all of the material that has been supplied to you by the applicant, or all of the intervenor questions and responses. It would be helpful if we could receive a full set of material by U.S. Mail prior to the deadline for final comments. A CD or DVD would be fine.

There is increased awareness in the North Country that the resource base known as the working landscape is both a source of marketable resources, such as wood and energy, and the foundation of the quality of life upon which other economic sectors, such as the knowledge and tourism economies, are based. Utilizing federal Economic Development Administration funding provided to help the region plan its recovery from the mill closings, North Country Council led the development of the recently completed Coos Economic Action Plan. The region's leaders in a broad range of sectors including business and education, with the help of other experts and feedback from the public, worked together to develop priorities for the reinvention of a sustainable Coos County economy. Priorities focused on wood products, health care, creative economy, energy, and tourism.

On a larger scale, North Country Council has also been working with regions facing similar economic challenges across northern Maine, Vermont, and New York through the Northern Forest Sustainable Economy Initiative. This also included a focus on both renewable energy and in keeping forests as forests for wood products as well as the foundation for the quality of life needed to attract the creative economy sector and tourism.

As you can see, the success of the long range plans for the development of the region rely upon careful consideration of each potential action step in these economic development strategies to ensure that an effort to achieve one goal does not act as an impediment to achieving another. While North Country Council supports the development of clean sustainable energy sources such as wind as one element of the region's economy, thoughtful planning will be necessary to ensure that this development does not take place at the expense of the natural and scenic resources upon which the greater North Country economy is based.

Specific comments and questions we have regarding the proposed Granite Reliable Power Wind Park at this point:

1. The potential effect of visual impacts on the character of the area and tourism industry should be carefully weighed in the Committee's decision. Which the exception of the lack of consideration of other colors which I will address below, I am confident in Jean Vissering's assessment. However, it is troubling to me that the basis of her conclusion that the proposed project would "not result in unreasonable adverse impacts to the scenic resources within the area" was based upon the presence of the many other relatively undisturbed surrounding hills and ridges. This point was made in Ms. Vissering's prefiled testimony in regard to the other hills and ridges blocking the view of most or all of the proposed wind park from many vantage points, as well as for the fact that only a small amount of the landscape, or view, would be impacted. Without knowledge of the proposed site for the applicant's other even larger wind park, the public has no assurance that Ms. Vissering's conclusion would be the same were the applicant's second proposal "in the picture" figuratively and literally.

Jean Vissering's guidance in the past has been that dark colors should be used for elements which will be seen against the forest. I would like to see an expansion of the visual analysis which considers which elements will be seen against the forest by most residents, which will be seen against the forest by most visitors, and whether the visual impact would be reduced with use of a darker color.

2. I have seen and heard several references to high elevation mitigation but have only seen specific reference to a buffer zone around the structures and access road, a zone I would assume the operator would need to control anyway for maintenance and safety purposes. I am interested in the opinions of NH Fish and Game Department staff and NH Natural Heritage Bureau experts as to the value of this amount, type and configuration of habitat. Also, what are the trade-offs of this being conserved? Will preserving the land along the roadway make any previously or potentially managed forest inaccessible?

3. Due to the possibility of future owners or related entities becoming insolvent, it is essential that the funds needed for decommissioning be secured up front, not merely guaranteed or insured.

4. Given the interrelationships between energy and the forest products industry, and the important role that both play in the region's economy, we feel the issue of remaining transmission capability is directly related to the Committee's required findings that the project "will not unduly interfere with the orderly development of the region" (RSA 162-H:16.IV.(b.)). This project may or may not be the best use of this remaining capacity. This is an issue which the Committee should seek more input on from the region's economic development leaders, with consideration of factors such as the number of jobs created and recent wood supply studies.

There has been no public process to evaluate the benefits of expanded transmission capabilities vs. the potential negative impacts. It is not a given that this approach is more desirable to the region and its residents vs. the alternative approach of energy conservation and small local energy projects. The decision on the proposed Granite Reliable Power Wind Park should not be made under the assumption that the traditional transmission capability will be expanded, but with the understanding that it may utilize what is the last remaining capacity as we know it for some time, at the expense of several small proposed wood to energy projects.

Thank you for the opportunity to provide input for the Committee's consideration of this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara E. Bamford". The signature is written in a cursive, slightly slanted style.

Tara E. Bamford
Planning Director

cc: Service List