

March 10, 2009

Via Email and Hand Delivery

Thomas S. Burack, Chairman
Site Evaluation Committee
N.H. Department of Environmental Services
27 Hazen Drive
Concord, New Hampshire 03301

***Re: Docket No. 2008-04 – Application of Granite Reliable Power, LLC
for a Certificate of Site and Facility for the Granite Reliable Power
Wind Park in Coos County***

Dear Chairman Burack:

On behalf of The Nature Conservancy of New Hampshire, we would like to express our appreciation for the opportunity to provide comments to the Site Evaluation Committee on the application of Granite Reliable Power, LLC (GRP) for a Certificate of Site and Facility for the Granite Reliable Power Wind Park in Coos County. Wind power poses a unique set of opportunities, challenges, and risks for New Hampshire, amongst which is the careful balance between the regional and global environmental benefits that derive from increasing the supply of clean renewable power and the more localized adverse environmental impacts that result from the development and operation of a wind generation facility.

The Nature Conservancy (“TNC”) is an international nonprofit organization dedicated to the conservation of biodiversity. Our mission is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. Our on-the-ground conservation work is carried out in all 50 states and in 30 countries with the support of approximately one million members. To date, we have helped conserve more than 117 million acres of land and 5,000 river miles around the world. For nearly 50 years, The Nature Conservancy has helped to protect over 260,000 acres in New Hampshire by utilizing sound conservation science and working with a wide variety of public and private partners.

TNC is not an intervenor in this matter nor have we taken a formal or public position on the GRP Wind Park project with the Site Evaluation Committee until today. TNC’s specific interests in this project derive from: a) the wildlife biodiversity and significant habitat features documented to occur in the project area, which have been extensively detailed by the Audubon Society of New Hampshire, the Appalachian Mountain Club, New Hampshire Fish and Game, and the applicant; and b) our large ownership of land, the nearby 10,700 acre Vickie Bunnell Preserve - this is TNC’s largest nature preserve in the state and includes 13 high elevation peaks above 3,000 feet, all of which are within the same unfragmented forest block as the proposed GRP Wind Park.

TNC has recognized climate change and society's response as a significant issue for biodiversity. We recognize that meeting NH's renewable portfolio standard goals, and shifting our nation away from its reliance on fossil fuels for energy, will necessitate the development and siting of new energy generation facilities. We further recognize that doing so will involve trade-offs, and that renewable energy facilities will often have local impacts on the natural environment. As an organization, we support the development of wind energy, appropriately sited, as one element of an energy solution, as demonstrated by our most recent support of the 195-turbine Maple Ridge Wind Farm in upstate New York. We believe that *appropriate siting* includes the avoidance or reduction of detrimental impacts to especially significant and sensitive natural resource features, where possible, and the suitable mitigation of those impacts that are determined to be unavoidable.

Our greatest hope for this project would be to see it move forward, get licensed and permitted, and produce clean renewable energy, with adequate mitigation for adverse impacts, but without the eight turbines and associated infrastructure proposed for Mt. Kelsey. Based on the information we have reviewed, we believe the potential impacts to wildlife species of concern – specifically American Marten, Bicknell's Thrush, and Three-Toed Woodpecker – along with sensitive high elevation habitat and documented old growth and mature forests, are real and substantial with regard to Mt. Kelsey. These ecological resources are not necessarily replaceable elsewhere. Development of roads, turbines and associated infrastructure in the heart of the Mt. Kelsey core forest will increase fragmentation, create pathways for invasive plants, and make the forest more susceptible to large disturbances such as blowdown, diseases and insects. The likely impacts and risks to Bicknell's Thrush and Three-Toed Woodpeckers in the proposed project are well articulated in New Hampshire Audubon's letter dated February 27, 2009, and the risks to American marten have been previously described in NH Fish and Game's pre-filed testimony (12/19/08).

GRP has an opportunity to set a solid standard for ecologically responsible wind energy development, as one of New Hampshire's first major wind farms, and to embrace a long-standing culture of stewardship of our resources in the Granite State that dates back to the creation of the White Mountain National Forest in the early 1900s. While we are not privy to all of the details of the proposed mitigation plan negotiated by NHF&G, AMC, and the applicant, what we know of this proposal gives us the impression that it satisfactorily mitigates for the environmental impacts of the proposed project with the exception of the proposed towers on Mt. Kelsey. Presently, we conclude that TNC can support three-quarters of the proposed GRP project or approximately 75MW of renewable energy. With the information available to us, we are unable to support the proposed turbines and infrastructure on Mt. Kelsey.

Absent evidence that the proposed towers on Mt. Kelsey are absolutely essential for the project to move forward, we believe that this part of the project proposal would have an unreasonable adverse effect on the natural environment under RSA 162-H:16(IV). We respectfully urge the Site Evaluation Committee to carefully consider, before issuing a permit, alternatives to the towers on Mt. Kelsey (including removal of those towers from consideration and/or placement of towers on other less sensitive ridgelines in proximity to the project) in its' review of the Granite Reliable Power certificate application.



Protecting nature. Preserving life.™

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TNC recognizes that our nation needs to move rapidly to take advantage of renewable energy sources. We need to do this to protect our economy from the high price of imported fuel, and because green energy can be an important source of new jobs to rebuild our economy especially in rural communities where fostering economic opportunities is critical to their future. We need to do this to protect habitats around the world from the impacts of energy extraction (such as mountain-top removal coal mining) and global climate change caused by fossil fuel emissions. This is why TNC supports public policies that encourage investment in renewable energy sources. But accelerating energy change will have big impacts on the landscapes that we share with nature. So, we must make these changes thoughtfully, while making strong efforts to avoid and mitigate those impacts that affect species and habitats of great concern.

It is our goal that we can continue to work with wind project developers such as GRP in an effort to protect our natural resources while realizing our shared goal of a clean energy future for the Granite State.

Sincerely,

A handwritten signature in black ink, appearing to read "Daryl Burnett".

Daryl Burnett
State Director

Cc: Steve Weber, N.H. Fish & Game Department
Peter Roth, N.H. Attorney General's Office
Doug Patch, Counsel, Noble Environmental Power
Ken Kimball, Appalachian Mountain Club
Michael Bartlett, N.H. Audubon