

**STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE**

RE: Application of Antrim Wind, LLC for Certificate )  
of site and facility to construct up to 30 MW of wind electric )  
generation in Antrim, New Hampshire and operate the same. )

**NORTH BRANCH RESIDENTS INTERVENORS GROUP'S RESPONSE TO  
APPLICANT'S RESPONSE TO NORTH BRANCH RESIDENTS INTERVENORS  
GROUP'S MOTION TO COMPEL RESPONSES TO DATA REQUESTS**

The North Branch Residents Intervenor Group ("Block Group"), through its spokesperson, Richard Block, has reviewed the Applicant's Response to our Motion to Compel Responses to our Data Requests. In response, and by way of further explanation, we respectfully submit the following to support our requests:

1. The Block Group's Data Request #1 seeks the wind data acquired by its meteorological tower erected on Tuttle Hill. The Applicant charges that "the Motion does not indicate that the Block Group is qualified to evaluate this information or why the Block Group needs this information to advocate for its interests in this matter." The Block Group has retained a wind industry professional who will interpret and analyze this wind data to determine the accuracy of the Applicant's claim of annual net capacity.

2. Our Data Request #2 seeks information as to the number of residences within a two-mile radius of the wind facility. Most of the Intervenor in our group live within the one-mile to two-mile range from the proposed facility. The North Branch Residents Intervenor Group does not accept that the Applicant has proven that there will be "no unreasonable adverse effects" one-half mile or beyond the turbines. Additionally, a request for population statistics within a two-mile radius is highly reasonable since the visual impact analysis has been addressed by the Applicant far beyond the two-mile radius.

3. Our Data Requests #9 and 10 requested additional sound data from what has been supplied by the Applicant. The North Branch Residents Intervenor Group still requests sound data "in the true subsonic range of the audio spectrum," i.e., for frequencies in the 5 to 30 Hz range. This has never been addressed by the Applicant.

4. The Block Group's Data Requests #18, 19, 20 and 21 seek additional visual simulations of the proposed turbine installation. These requests are reasonable since the Applicant has not provided sufficient visual simulations of the potential views of the project from the north, where most of the Intervenor in this group live. Additionally, the Block Group challenges the claim that the "VIA is adequate and appropriate to support a determination that the project will not have an unreasonable adverse effect on aesthetics."

Without simulations from areas near the heaviest concentration of residences, it is impossible to determine this. The Applicant claims that “the new locations requested by the Block Group are private residences - not areas that are frequented by the public at large,” yet two of the requests are the views from public roads, one of which, from the “south end of Loveren Mill Road at the entrance to the Nature Conservancy’s Loveren Mill Cedar Swamp Preserve” (see Block Group Data Request #1-18), is also next to the NH Fish & Game fishing access on the North Branch River and is thus a highly frequented public site used by both hikers and fishermen.

Therefore, the Block Group respectfully asks that the Committee grant our Motion to Compel to enable us to fairly and accurately present our case as Intervenors.

Respectfully submitted this 20th day of July, 2012,

North Branch Group of Intervenors, by spokesperson:

A handwritten signature in black ink, appearing to be 'Richard Block', written over a horizontal line.

Richard Block

Richard Block  
63 Loveren Mill Road  
Antrim, New Hampshire 03440  
603-588-2552  
[snowstar@tds.net](mailto:snowstar@tds.net)

cc: Parties to Docket 2012-01