



May 31, 2013

New Hampshire Site Evaluation Committee
Attn: Ms. Jane Murray
29 Hazen Drive
Concord, NH 03302

Dear Chairman Ignatius and Members of the Committee,

I am writing on behalf of the New Hampshire Sustainable Energy Association ("NHSEA"), a statewide, member-based 501(c)(3) organization, to request that you reconsider the Antrim Wind Energy decision issued on May 2, 2013.

NHSEA's mission is to educate New Hampshire citizens, businesses, and organizations about sustainable energy and to advocate in New Hampshire for favorable sustainable energy policies. We are a member-based organization, and our members include homeowners, business owners, builders, renters and other professionals.¹ Our members are concerned about New Hampshire's energy future: finite natural resources, the rising costs of imported fossil fuels, and the urgency surrounding climate change adaptation and mitigation.

We have not taken a position regarding the Antrim Wind project and will not do so here. However, we are concerned about the standard that the Site Evaluation Committee ("SEC") has set concerning aesthetics and the visual effects of wind energy projects in the State of New Hampshire, and we are troubled by the impact that the Antrim Wind decision could have on the future development of renewable energy projects within the State.

Renewable energy, including wind energy, is a vital element of our state's energy future. The goals and language set forth in RSA 362-F (the Renewable Portfolio Standard), the New Hampshire Climate Action Plan, and former Governor John Lynch's Executive Order Number 2011-1 demonstrate our state's commitment to renewable energy. We fear that the SEC has set a standard with respect to aesthetic impacts which will make it very difficult for the State to further its renewable energy needs and goals.

In particular, we are concerned that the Committee's focus on impacts to viewsheds will limit development of well-sited projects, or will require investment in expensive and environmentally impactful transmission development to site projects far away from our communities. In support of its conclusions, the SEC states that "[t]he location for the site is not remote and is within the viewshed of numerous areas, both publicly and privately owned, where the public will see a significant impact on the landscape." (Majority Decision, page 50). As a result of New Hampshire's investment (both private

¹ We feel obliged to note that none of the developers of the Antrim Wind project are members of NHSEA.

and public) in public lands and conservation areas, we fear that this broad standard would apply to most potential wind sites in the State.

As the SEC is aware, much of our electricity is generated indirectly from the combustion of coal, natural gas, or through enriched uranium. These are all finite resources that must be mined or drilled, and then imported, all of which are expensive and often destructive processes, where the costs are externalized to people's health, the water supply, and the air. New Hampshire can take better responsibility for how it captures and uses energy. While it is true that wind turbines are, by definition, visible, they also give us the opportunity to confront our electricity habits, incentivizing us to better conserve, more prudently build, and better invest our money at home rather than in distant mines or gas fields. We need all available New Hampshire-based clean resources to power our homes and businesses – setting a standard which may not be reachable for any project is surely not the way to move our state forward.

We are also concerned about the SEC's finding that "dedication of lands to a conservation easement in this case would not suitably mitigate the impact because they would not mitigate the imposing visual impact that the Facility would have on valuable viewsheds." (Majority Decisions, page 52). The visual impacts of wind turbines are inevitable, but temporary. Conservation easements serve to mitigate the impacts not just while the turbines are standing, but in perpetuity. They are an important tool in making sure that projects are properly sited and mitigated.

Finally, we recommend the SEC consider visual impacts in the context of whether the resource is of state, regional, or national importance. While there are some places where wind turbines surely do not belong, we are concerned that the visual preferences of individuals or private groups will be given disproportionate weight in contravention of the needs of all New Hampshire citizens and the State's established goals to support clean, renewable energy sources.

We strongly encourage the Committee to reconsider its decision and carefully evaluate all of the relevant facts and evidence to ensure that the SEC is not setting a visual impact standard which jeopardizes the future of wind and other important renewable energy technologies in our State.

Yours truly,

A handwritten signature in black ink, appearing to read "Kate Epsen", with a long horizontal flourish extending to the right.

Kate Epsen
Executive Director