



**LAKES REGION CONSERVATION TRUST**

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*Conserving the Natural Heritage of  
the Lakes Region of New Hampshire*

January 15, 2014

Site Evaluation Committee

Attn: Commissioner Thomas Burack

New Hampshire Department of Environmental Services

PO Box 95

Concord, NH 03302-0095

Re: Wild Meadows Wind Power Project  
SEC Docket No. 2013-02

Dear Commissioner Burack:

The Lakes Region Conservation Trust (LRCT) is writing to express our opposition to the Wild Meadows wind power project proposed for the towns of Alexandria and Danbury. For the reasons described herein, we have significant concerns about the appropriateness of siting an industrial scale wind power development in highly visible locations in the Newfound region, particularly in the absence of comprehensive siting criteria, and we urge that the Site Evaluation Committee deny the project's application for a certificate under NH RSA Chapter 162-H.

The Lakes Region Conservation Trust was founded in 1979 to conserve the natural heritage of New Hampshire's Lakes Region — the lakes, forests, and mountains that make this region such a special place, that have attracted and inspired year-round residents and seasonal visitors for many generations, and that are essential to our community character and the health of our local economy. In pursuit of our mission, LRCT works with landowners and communities to acquire land and conservation easements to conserve critical wildlife habitat and diverse ecosystems, protect natural landmarks and scenic landscapes, provide outdoor recreational opportunities, and preserve community character. Since the organization's founding, LRCT has conserved over 23,000 acres of land throughout the region.

LRCT is particularly concerned about the Wild Meadows project for the following reasons:

First, as described above, conserving the Lakes Region's scenic landscapes, community character, wildlife habitat, and outdoor recreational opportunities are at the core of LRCT's mission. These are essential factors in making the Lakes Region attractive as a place to live and visit and as a place where people enthusiastically embrace land conservation efforts by organizations such as LRCT. Construction of an industrial scale wind power project such as Wild Meadows — 23 turbines with total turbine tip heights of 492 feet (greater than the height of New Hampshire's tallest building and more than three times the height of the New Hampshire State House), as well as access roads and transmission lines — is inconsistent with preserving these important qualities of the Lakes Region and would have significant adverse effects on the landscapes, views, and character of a substantial part of the region.

Second, unspoiled summits and ridgelines overlooking lakes and valleys are particularly important to the Lakes Region's extraordinary scenic and rural character, unfragmented wildlife habitat, and recreational opportunities. Conserving summits and ridgelines has long been one of LRCT's highest priorities. LRCT has conserved thousands of acres in the Ossipee Mountains, including the Castle in the Clouds Conservation Area overlooking Lake Winnepesaukee and the Ossipee Mountains Preserve in the northern Ossipees (together, 8,473 acres), on Red Hill between Lake Winnepesaukee and Squam Lake (2,678 acres), and in the Squam Range north of Squam Lake (2,471 acres). Among LRCT's current or anticipated future projects are the conservation of key parcels encompassing summits, ridgelines, and slopes of the Belknap Mountains, additional parcels in the Ossipee Mountains and on Red Hill, and upland properties overlooking Newfound Lake. The Wild Meadows facilities would have a significant adverse visual effect on their ridgeline locations and would be highly detrimental to the scenic quality of the many places, developed and undeveloped, from which these facilities would be visible.

Third, the Newfound Lake watershed is a key area for land conservation by the Lakes Region Conservation Trust. With its scenic slopes and ridgelines, large tracts of forested habitat, productive agricultural lands, pristine waters and shorelines, and peaceful town centers, the Newfound region is a special part of the Lakes Region. LRCT is a founding member and active participant in the Newfound Land Conservation Partnership (a collaboration among LRCT, the Society for the Protection of NH Forests, and the Newfound Lake Region Association), formed in 2009, to encourage land conservation in the Newfound watershed. In addition, LRCT is the custodian of the John Gemmill Newfound Fund, established in 2011 to facilitate conservation of key lands in the watershed. During the past three years, LRCT has completed five land conservation projects in the Newfound watershed, and more are underway. Consequently, LRCT has great concerns about the adverse impacts of projects of such as Wild Meadows on the Newfound region's inherent natural and scenic qualities and community character that are so valued by residents and visitors and so important to the local economy.

We believe that the concerns expressed above are particularly important in light of the requirements for issuance of a certificate under NH RSA Chapter 162-H. As you know, RSA 162-H:16 provides that before issuance of a certificate, the Committee must find that the proposed site and facility "[w]ill not have an unreasonable adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety." This standard relates directly to the mission-based reasons why LRCT opposes the Wild Meadows project. Given the significant visual and physical impacts of large wind power installations in highly visible upland locations within a rural landscape, and their associated access roads and transmission lines, we believe that this statutory standard is not met.

Our conclusion is reinforced by consideration of the Visual Impacts provisions of the 2007 Proposed Wind Power Siting Guidelines. Those provisions state that "[u]ndeveloped forest landscapes are an important component of both the state's economy (as they form the backdrop for outdoor recreation) and its quality of life (especially for rural communities). While there are diverse opinions on the aesthetic qualities of modern windpower facilities, they can be a

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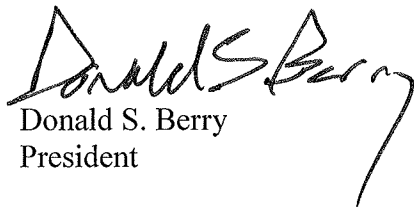
dominant and potentially discordant element within undeveloped forested landscapes.” Review of these guidelines indicates that the Wild Meadows project should be considered to raise the highest level of concern. Furthermore, we join with others in concluding that a certificate for the Wild Meadows project should not be issued now given the ongoing work to develop comprehensive siting criteria pursuant to SB 99.

The Lakes Region Conservation Trust recognizes, as stated in RSA 162-H:1, that it is in the public interest to maintain a balance between the environment and the need for new energy facilities in New Hampshire and that it is essential to assure that the state has an adequate and reliable supply of energy in conformance with sound environmental principles. We also recognize the vital role of renewable energy sources in assuring this energy supply, the need for careful evaluation of appropriate sites and facilities for energy generating facilities, and the challenging trade-offs involved in siting such facilities and achieving the balance called for by the Legislature.

Nonetheless, we believe that a project such as Wild Meadows should not be approved because it poses a direct threat to the natural heritage, scenic landscapes, and community character of the Newfound region, would fragment wildlife habitat, and could preclude public access to large undeveloped woodland tracts. All of these considerations are at the heart of LRCT’s land conservation mission.

We are grateful for the Committee’s work to balance the state’s energy supply needs with the essential protection of the state’s extraordinary natural and scenic resources, and we appreciate the opportunity to express our concerns regarding the Wild Meadows project. If we can provide further information on this matter, please do not hesitate to contact us.

Sincerely,

  
Donald S. Berry  
President

cc: Governor Maggie Hassan  
Town of Alexandria Selectboard  
Town of Danbury Board of Selectmen