

Ms. Jane Murray 13 March 2015

Attached are my second set of suggested revisions/additions to the draft SEC Rules of 16 December 2014, and the reasons therefore. They are for dissemination.

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Under Section 301.03(i)(1), add after "components", "and using as the height of the turbines, the height of the top of the blades of the highest turbine above the average elevation of the surrounding neighborhood out to at least 10 miles, but omitting from the average elevation the area included in the hill on which the site is to be located".

This is a recognition that a 500' turbine on a 1000' hill has a visual impact equivalent to, or greater than, a 1500' turbine on flat land. The meteorology and topography of New Hampshire are being misused by allowing siting of such facilities on hills, ridges and mountains. No one would allow a developer to build a hill and then put a turbine on it without accounting for the combined height. That the NH hills are "natural", changes the situation not a whit. The visual impact of the towers, and the area over which their impact, and their cumulative impact, will be felt depends on their height above the land on which their visibility is to be seen. Any other definition of visual impact, and cumulative visual impact (because the cumulative impact depends on the number of towers visible for any point in the landscape) is meaningless, and therefore irrelevant! As noted in my earlier note, this definition puts all other comments into a realistic setting, requiring that the discussions of noise, shadow flicker, icing and throwoff, etc., will be considered in their real-world context.

In 301.10(a), Add "these cumulative impacts are exacerbated by the siting of these facilities on elevated sites, expanding their prominence, their visible distance, and their contrast with their neighboring environment". The potential cumulative limit due to nighttime surges, discussed in Section 7 of my proposed revisions, dated 10 March 2015, also needs to be specifically covered in Site 301.10(a). I propose the following be added after "and ", "the cumulative impact of nighttime surges on the ISI\O/NE grid".

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