

March 23, 2015

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Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

Subject: New Hampshire Site Evaluation Committee Rulemaking, Docket No. 2014-04

Attorney Wiesner:

In response to the Site Evaluation Committee (“Committee”) notice 2015-12 dated March 5, 2015, for the submission of comments in Docket 2014-04 on the initial proposals to adopt with amendments the Committee’s administrative rules, Site 100-300, we, Richard Block and Lorraine Carey Block of Antrim, New Hampshire, submit this document for consideration by the Committee.

We have resided at 63 Loveren Mill Road in the town of Antrim since 1988. In that time, either or both of us have been members of the Antrim Conservation Commission, the Contoocook and North Branch Rivers Local Advisory Committee, Coverts Coordinators for the New Hampshire Coverts Project, and Land Stewards for the Nature Conservancy. Both of us have university degrees in design and visual studies, and Richard is Professor of Graphic Communications and Visual Arts at Franklin Pierce University. In addition, we have been involved as Committee designated Intervenors in SEC Docket Numbers 2011-02, 2012-01, 2014-05, and 2015-02, so we are quite familiar with the Committee’s operation and procedures.

We appreciate the efforts being made by the Committee to reorganize and hopefully be more responsive to the needs of not only the State, but also of the local communities in siting future energy facilities. To this end, we urge your consideration of the following concerns:

- Re: Site 301.05 ¶ (b)4 (*Effects on Aesthetics – visibility analysis*), we are concerned that a 10-mile radius may not be enough to accurately reflect the actual impact of a large wind facility on a region. In the case of Antrim Wind’s rejected proposal for an installation on Tuttle Hill, the cumulative effect of the visibility of the project on more distant scenic resources such as the summits of Pitcher Mountain and Mount Monadnock was of great concern. To this end, we suggest that *all* significant scenic resources and viewpoints which may be impacted by the presence of tall turbines be identified, regardless of the distance from a project.
- Re: Site 301.05 ¶ (b)4-f (*Effects on Aesthetics – scale*), we consider the issue of “the scale of the proposed facility relative to surrounding topography and existing structures” to be absolutely essential and a key component in assessing visual impact.

- Re: Site 301.05 ¶ (b)7 (*Effects on Aesthetics – photosimulations*), in order to allow images of a proposed project to reflect the most accurate simulation of real-life impacts, we urge the Committee to include language specifying that photosimulations be based on images taken on clear days and that no manipulation such as hazing or other atmospheric effects be added.
- Re: Site 301.07 ¶ (c) (*Effects on Environment*), we feel it is important for an applicant to identify not only the environmental impact of a project on the property and abutting lands, but also how this site and proposed installation will impact the larger region as far as contiguous wildlife corridors and relatively undeveloped expanses of land.
- Re: Site 301.08 ¶ (a)4 (*Effects on Public Health and Safety – ice throw and tower collapse*), any study of the impact of these potential hazards must be based on property lines and not just on existing structures, whether permanently occupied or not. All landowners have equity in their property whether they reside on it year-round or not, and any potential hazards to any part of a landowners' property may impact future construction and be construed as an unjust "taking" of property value.
- Re: Site 301.09 ¶ (b)4 (*Effects on Orderly Development of Region – regional real estate values*), applicants should be required to identify not just overall average impact on real estate valuation in a wide region, but the impact on specific local properties, such as the potential impact on all properties within a 2-mile impact zone, with assessments of before and after values. Many communities have value and taxation based on views from properties and the effect of a potential large-scale wind turbine facility on specific individual properties and homes should be identified for the residents and landowners near a proposed project.

We thank the Committee in advance for your diligence in reviewing all public comments and urge your consideration of the points we have identified in this communication.

Sincerely,



Richard Block



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