

Draft Rules, with revisions in bold italics:

301.02 1 (p. 32 revised version)

“(d) A computer-based visibility analysis to determine the area of potential effect, which, for proposed wind energy systems, shall extend to **at least 10 a 20** mile radius from each wind turbine in the proposed facility **and 30 miles from scenic viewpoints**, and, for electric transmission lines longer than 1 mile, shall be ½ mile in urban areas, ~~2~~ **3** miles in suburban, rural residential, village areas ~~3~~ **5** miles in lightly developed, undeveloped landscapes, **and from scenic viewpoints**, where the line follows an existing transmission corridor, and ~~5~~ **10** miles in lightly developed or undeveloped landscapes, **and from scenic viewpoints**, where the line would be located in a new transmission corridor;”

(1) Visibility analyses must assume an absence of foliage.

It is not enough to designate an APE around projects, the rules should specify APEs for scenic viewpoints, from which projects may be visible at great distances.

Eversource acknowledges the importance of scenic viewpoints and the distances at which transmission lines and ROWs are visible, in their visual simulations:

Bald Knob, Easton: 2.46-2.68 miles (existing line, rural)
South Kinsman, Easton: 3.89-5.26 miles (existing line, rural)
Rocks Estate, Bethlehem: .61-4.82 (existing line, rural)
Turtle Pond, Concord: .15-.91 (existing line, suburban)
Mt. Lafayette, Franconia: 6.7-7.74 (existing line, undeveloped)
Webster Lake, Franklin: 1.51-1.52 miles (existing line, suburban)
Weeks State Park, Whitefield: 1.14-1.24 miles (existing line, rural)
Mt. Pemigewasset, Franconia: 1.75-1.97 miles (existing line, undeveloped)
Mt. Liberty, Franconia: 4.98-5.36 miles (existing line, undeveloped)
Burns Pond, Whitefield: 2.01-2.55 miles (existing line, suburban)

These photosimulations support the APEs recommended above.

“g. Photosimulations from representative key observation points, and from other scenic resources for which the potential visual impacts are characterized as “high” pursuant to f. above, to illustrate the potential change in the landscape that would result from construction of the proposed facility and associated infrastructure, including land clearing and grading and road construction.”

(1) Photosimulations may be done in any season but must be done in winter.

Visual simulations must be done in winter when leaf cover is down (as it is most of the year) and turbines, structures and transmission towers and rights-of-way are most visible (the last with their highly visible swaths of unforested lands covered in snow.)

Misleading visual impact studies, which failed to account for NH’s seven months lack of leaf cover, have been an issue in past SEC hearings.