Antrim Wind, LLC SEC Docket No. 2014-05 Page 1 of 14 April 13, 2015

STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

RE: Petition for Jurisdiction over a)	
renewable facility By Antrim Wind, LLC)	

PRE-FILED DIRECT TESTIMONY OF RICHARD BLOCK AND LORANNE CAREY BLOCK

Q: Please state your names and address.

A: Richard Block and Loranne Carey Block, 63 Loveren Mill Road, Antrim, New Hampshire 03440.

Q: Richard, who is your current employer and what position do you hold?

A: I work at Franklin Pierce University in Rindge, New Hampshire as Professor of Graphic Communications, Visual Arts, and Information Technology. I have been at Franklin Pierce since 1986 and have been teaching visual studies and related fields on the college and university level for 45 years. My professional and educational experience is fully listed in my resumé which is attached as Exhibit RB-1.

Q: Richard, what are your qualifications to speak to the application presently before the Site Evaluation Committee?

A: I have lived in Antrim since 1988. Our property consists of a house and farm on 242 south sloping acres, directly across from and in full view of Tuttle Hill, less than a mile from the proposed Wind Turbine site. Over the 27 years we have lived here, I have served on the Antrim Conservation Commission, The Contoocook and North Branch Rivers Local Advisory Committee, and as a New Hampshire Coverts Cooperator. Since its creation as part of Antrim's 1989 revision to the Zoning Ordinance, my wife Loranne and I have been active

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proponents for and supporters of the Rural Conservation District, starting with our successful petition in 1990 to extend the District to the town line across the north side of Route 9. On two occasions, we were instrumental in fighting off proposals to create a prison in the North Branch region of Antrim. In 1999, the Society for the Protection of New Hampshire Forests named us as informal stewards for the Nature Conservancy's Loveren Mill Cedar Swamp property and the adjacent Meadowsend Timberland forestry holding because of our historical, cultural, and environmental concerns for the region.

Since 2013 we have actively opposed the Antrim Wind Energy ("AWE") proposed siting of an industrial wind facility in the RCD, due to the zoning ordinance's specific prohibition of industrial activity and tall structures in this district and the potential negative impact of such a facility on the greater region. We were the primary appellants in several appeals of Planning Board and ZBA decisions about Antrim Wind Energy's applications and were also the plaintiffs in two Superior Court suits against the Town of Antrim challenging the permitting of the met tower. We were Intervenors in SEC Docket #s 2011-02 and 2012-01. I served as spokesperson for the North Branch Group of Intervenors in both of those cases.

My professional qualifications include a degree in two- and three-dimensional design as well as technical theater including modeling and visualization of scenic and architectural designs. I also have a Master of Fine Arts from Bard College with a specialization in Intermedia and computer graphics. For the last 45 years I have taught design, visual studies, and graphic communications on the college level, including courses involving digital photography and computer image manipulation using programs like Photoshop. In the past I have also worked as an art director and creative director in the advertising industry and as a cartographer for the State of Massachusetts.

Q: Loranne, what are your qualifications to speak to the application presently before the Site Evaluation Committee?

A: I have a degree in Art (SUNY Binghamton, 1971) with a specialization in design and photography, and additional post-graduate work in photography. I have taught photography and additionally worked in the field of outdoor education. For the past 20 years, I have operated Snow Star Farm, selling a naturally dyed yarn that specializes in a sophisticated

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color palette. I am included on the New Hampshire State Council on the Arts Traditional Artist Roster for my work in this field.

During the 27 years that I have resided and worked on our property on Loveren Mill Road, I have advocated for conservation in this area through zoning amendments and work with the Nature Conservancy on the Loveren Mill Cedar Swamp property. Additionally, I have served on the Contoocook and North Branch Rivers Local Advisory Committee and Antrim's Open Space Committee as well as being a New Hampshire Coverts Cooperator.

Q: Have you previously testified before this Committee?

A: Yes. We submitted written and oral testimony in both SEC Docket #s 2011-02 and 2012-01. Additionally Richard was appointed to act as spokesperson for the North Branch Group of Intervenors in both of those cases, conducting cross-examination and responding to questioning from Antrim Wind and their attorneys.

Q: What is the purpose of this pre-filed testimony?

A: The purpose of this testimony is to provide the Site Evaluation Committee ("SEC") with detailed information about why the proposed application from AWE for a revised industrial wind facility on the Tuttle Hill/Willard Mountain ridgeline is substantially similar to their previous application, and thus should not be accepted for jurisdiction by the SEC.

Q: In your estimation, does the Prefiled Direct Testimony of Jack Kenworthy support his premise?

A: The premise of Mr. Kenworthy's testimony, and in fact the basis of AWE's intention to file a new application and seek SEC jurisdiction, is his claim that the revised plans for their industrial wind facility are "ultimately, a different project with different impacts" than the proposal which was denied certification by the SEC in 2013 (SEC Docket #2012-01.) In examining the revised project details that Mr. Kenworthy has outlined in his Testimony, we

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find the changes do not constitute a project that is substantially different.

Mr. Kenworthy characterizes his "most fundamental changes" as the removal of turbine #10 and the "substantial reduction in height of turbine #9." The removal of turbine #10 does not significantly change the overall footprint of the project. (See Exhibit RB-2, Composite Map of Rejected and "New" Projects). When the new project map is overlaid upon the original layout map of the 2012 project rejected by the SEC, it is clear that the footprint of the proposed "different project" is almost identical. Aside from the removal of the short stretch of access road between turbines #9 and #10, the remainder of the road layout is absolutely the same.

Mr. Kenworthy claims that they have "significantly redesigned turbine #9 to decrease its height and reduce its visual impact." The fact is that the proposed new height for turbine #9, at 446.2 feet is still 91% of the original proposal. Turbine #9, even with the reduction, is still over 170 feet taller than the tallest building in the state and still taller than any wind turbine now in operation in New Hampshire. As the SEC stated in their 2013 decision, "the proposed turbines are the tallest ever sought to be certificated in this state" [Docket No. 2012-01, Decision and Order Denying Application for Certificate of Site and Facility, April 25, 2013 — page 50]. The 42.6-foot reduction in height from the remainder of the turbines is a mere token, and Mr. Kenworthy's claim that this will result in "virtually eliminating the visual presence of the turbine from Willard Pond" is a complete exaggeration.

Mr. Kenworthy indicates that the tower and nacelle, at 261 feet, would "now sit below the tree line." This statement is absurd. A 100-foot tree in this part of the world is a very tall tree; the ridgeline trees are far below that. Even if he is talking about visual perspective from a distance, Mr. Kenworthy fails to recognize that the spinning blades, the most visually distracting part of any turbine, will still be totally visible.

The claim that they have reduced the height of the remaining turbines is a gross exaggeration. The change in height from 492 feet to 488.8 feet is a mere reduction of 38 inches, less than two-thirds of one percent, a factor of only 0.0065. It is not possible to interpret that "the turbine array has been materially altered" and that it represents "a substantial difference in the configuration of the proposed facility," as Mr. Kenworthy concludes. In fact, he admits "AWE's new application will retain the many favorable components of the project

reviewed by the SEC in Docket 2012-01."

Q: Do the proposed changes ameliorate the issues with scale and/or impact on the region as noted in the SEC's 2013 decision?

A: In its 2013 decision, the SEC was very clear to note that "The subcommittee finds that the size of the proposed wind generators, when imposed upon the Tuttle Hill/Willard Mountain ridgeline would appear out of scale and out of context with the region." [Docket No. 2012-01, Decision and Order Denying Application for Certificate of Site and Facility, April 25, 2013 — page 50]. A reduction in turbine height of only 38 inches does nothing to alter the visual impact.

In its decision of May, 2013 on Docket #2012-01, the SEC found that "the size of the proposed wind turbine generators, when imposed upon the Tuttle Hill/Willard Mountain ridgeline would appear out of scale and out of context with the region" [emphasis added — see Docket No. 2012-01, Decision and Order Denying Application for Certificate of Site and Facility, April 25, 2013 — page 50]. The final report is very careful to emphasize that the SEC's judgement of adverse aesthetic impact applies to "the surrounding region." The specific negative impact it would place on the Willard Pond area is added in only after the discussion of the "unreasonable adverse impact" on the entire viewshed, yet both Mr. Kenworthy and Mr. Raphael only address how their proposed changes will affect Willard Pond, ignoring the fact that the greater impact on the surrounding region would be substantially unchanged.

Q: Do you have concerns about the Prefiled Direct Testimony of David Raphael?

A: Mr. Raphael characterizes the proposed changes to AWE's proposal as having "a substantial effect" on the aesthetic impacts of the project to the surrounding area. What he has failed to note, however, is that, regardless of the changes to turbines #9 and #10, the remainder of the installation will have exactly the same visual impact that the original proposal would have had. From any areas where turbines #9 and #10 would not have been visible in the original layout, the aesthetic impact of the new configuration will be abso-

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lutely identical. This includes all viewpoints from the north and west. In fact, many of the photosimulations created by Saratoga Associates would still be valid for the revised proposal since they do not even show turbines #9 or #10 and the visual impact of the remainder of the project would be unchanged. [see Docket #2012-01, Appendices 9A-9D – January 31, 2012: Figures A2-B, A3-B, A4-B, A5-B, A6-B].

The most troubling part of Mr. Raphael's testimony is the collection of photographic simulations he includes. The comparison of photosimulation attachment DR-3(b) to DR-3(c) makes blatantly obvious his methodology to illustrate how the "new" turbine layout will have an "improved" visual impact. Although the very same base photo was used to illustrate here the difference between the 10-turbine and the 9-turbine layouts, in every instance, the image of each of the nine turbines represented on DR-3(b), the proposed 9-turbine layout, has been modified, resulting in less contrast between the turbine and the sky and the appearance that they would be less visible, similar to the effect of haziness. When one compares the Bald Mountain simulations, DR-4(b) and DR-4(c), the muting of contrast is even more unmistakable. Although the original Saratoga Associates photosimulations were, in our opinion, slanted toward minimizing the visual impact of the turbines, the new LandWorks photos are far more deceitful with so much haze and fog effect applied so as to make the turbines almost invisible. Mr. Raphael appears to be claiming that if a rendering of the proposed project shows little visual impact, then the final project will likewise have little effect. Photographic manipulations that minimize the visual effect of the same turbines in a reworked simulation do not constitute a changed or improved aesthetic impact.

Q: What is your opinion of the additional mitigation measures proposed by AWE?

A: The addition of 100 acres to the conserved land does little to mitigate the overall negative impact that this facility would have on the town and region. In its decision to deny a Certificate to AWE the SEC stated clearly that "the dedication of lands to a conservation easement in this case would not suitably mitigate the impact. While additional conserved lands would be of value to wildlife and habitat, they would not mitigate the imposing visual impact that the Facility would have on valuable viewsheds." [Docket No. 2012-01, Decision and Order Denying Application for Certificate of Site and Facility, April 25, 2013 — page 53]. It should also be noted that AWE approached the Town of Antrim to request that they

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hold the easement on these 100 acres, but the Town refused to do so. To the best of our knowledge, no other organization has agreed to hold this easement either. The difference between 808 acres and 908 acres of proposed conserved land is insignificant and in no way would any of this conservation effort help the wildlife and habitat of the ridge for many decades until the large-scale industrial wind facility is removed. Likewise, a future tract of conserved land does nothing to alleviate the negative visual aesthetic impact imposed by this project on the residents and property owners of the area as well as the users of numerous recreational opportunities in the region.

AWE's proposal of a \$40,000 payment to the Town of Antrim to totally mitigate the aesthetic impact on Gregg Lake is woefully inadequate. This has always been one of Antrim's true gems, and there is nothing that could be done with that money which would erase the visual effect of the turbines on the public beach or the many homes surrounding the lake. Mr. Kenworthy, at one point, even suggested using the money to erect a kiosk extolling the virtues of wind power, as if that would diminish the panoramic view of the turbines.

Q: What have you concluded about AWE's proposal and request for SEC jurisdiction?

A: We believe the only logical decision must be to deny jurisdiction. The original AWE proposal was denied certification due to strong opinions by the majority of the SEC members that the proposed facility configuration was not appropriate for Antrim. Upon AWE's appeal, the SEC upheld their original decision with even stronger language. The proposal that AWE intends to present if jurisdiction is granted, has only insignificant changes from the original with most of the facility remaining virtually exactly as originally presented in 2012. They have even admitted that much of the supporting application materials and studies would be resubmitted with this application since so much of it is substantially the same. The intent of the SEC rules is that once a project (and an appeal) is denied, it should not be allowed to return unless the new proposal is essentially a different project. This is not.

Q: Does this conclude your testimony for the SEC?

A: Yes, it does.

Exhibit RB-1

Resumé of Richard Block



EDUCATION

MFA, 1985; Milton Avery Graduate School of the Arts, Bard College, Annandale-on-Hudson, NY; Intermedia, with specialization in Design, Computer Animation, and Multimedia

BA, 1971; Harpur College, State University of New York, Binghamton, NY; Dual majors in Studio Art Design and Theatrical Design

TEACHING EXPERIENCE

Professor of Graphic Communications and Information Technology, Franklin Pierce University, Rindge, NH; 1986-present.

Courses taught: Typography; Graphic Design 1, 2, 3, 4; Computer Graphic Design 1, 2; Digital Photo Manipulation; Two- and Three-Dimensional Design; Graphic Production; Negative and Color Stripping; Introduction to Graphic Communications Internship; Internship Capstone; Information Technology; Experiencing the Arts.

Other Responsibilities: Graphic Communications Department Coordinator, 1997-present; responsible for budget, course scheduling, and supplies. Experiencing the Arts Coordinator, 2011-2013; responsible for budget and major arts event scheduling. Acting Chair, Division of Visual Arts, 1991. Established and developed Macintosh computer lab for Graphic Communications Department and the University. Co-developer of interdisciplinary major program in Information Technology. Also designed sets for Theatre Department productions, performed in the pit band in several musicals, and taught private bass lessons through the Music Department.

Coordinator, Graphic Design Certificate Program, University of Vermont Continuing Education, Brattleboro, VT; 1994-1997; Instructor, 1994-2000.

Courses taught: Introduction to Graphic Design, Typography, Paste-Up and Mechanicals. Other Responsibilities: Supervising curriculum, hiring of instructors, marketing of program.

Faculty in Art and Theatre, Simon's Rock College, Great Barrington, MA; 1981-1986.

Courses taught: Microcomputer Graphics; Two-, Three-, and Four-Dimensional Design; Introduction to Design Rendering; Typography and Calligraphy as Design Forms; Advertising and Packaging Design; Color Perception; Designing a Personal Environment; Survey of Stagecraft; Theatre Production; Scene and Lighting Design; Bass Guitar.

Other Responsibilities: Established first computer facility for the Arts Division. Technical Director of Theatre; supervising crews, planning budgets, purchasing, designing lights and sets for all major theatrical productions.

Professional Graphics Experience

Free-Lance Graphic Designer, 1972-present.

Creating CD/Cassette covers, posters, brochures, maps, advertisements, etc.

Camera and Graphics Consultant, Yankee Publishing, Inc., Dublin, NH; 1988-1990.

Assisting with production of publications, including Yankee Magazine and The Old Farmer's Almanac; designing camera studio layout; training personnel in use of camera.

Creative Director and Consultant, Multi Media Group, Inc., Pittsfield, MA; 1982-1984.

Design/direction of corporate logos and identity campaigns; design and production of various publications and directories; programming, maintenance, training of personnel on computerized typesetting equipment.

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Professional Graphics Experience (continued)

Art Director and Production Manager, Earth Traveler, Inc., Rhinebeck, NY; 1979-1981.

Designing/producing advertising and marketing materials and new products for pack, luggage, and softgoods manufacturer.

Art Director and Production Manager, Ralley Communications, Hillsdale, NY; 1976-1979.

Designing/producing complete advertising campaigns; designing and producing the Intermountain Express, a weekly feature newsmagazine, circulation 25,000.

Graphic Artist and Camera Specialist, Ideas in Ink, Great Barrington, MA; 1972-1976.

Layout, photography, color separation, film processing, stripping, platemaking.

OTHER PROFESSIONAL EXPERIENCE

- Co-Owner with Loranne Carey Block, Snow Star Farm and Snow Star Design, Antrim, NH; 1992-present. Sheep and wool, producing and marketing naturally dyed yarn and custom wool products along with publishing exclusive knitting patterns as well as greeting cards and various products, including original design wool and Polartec mushers' apparel.
- Performing Musician, 1971-present.

On Guitar and Acoustic, Electric, and Fretless Bass; touring throughout US and Canada. May, 2009: Performed at the Library of Congress and the Kennedy Center, Washington, DC with my son, nationally recognized fiddler Brendan Carey Block.

State-appointed Spokesperson, May 2009 to December 2013 — Represented North Branch Antrim residents in New Hampshire Site Evaluation Committee hearings in opposition to an application from Antrim Wind, LLC for a proposed industrial wind installation; served as an expert witness on aesthetics and as cross-examiner of applicant's experts. Basing its decision primarily on aesthetic concerns, this was the first application ever denied by NH SEC.

RELATED PAST ACTIVITIES

- November 1995 Prior Learning Assessment Evaluator, College for Lifelong Learning, University of New Hampshire, Concord, New Hampshire.
- November 1993 "Typography–from Manuscript to Macintosh", presentation for the Small Computers in the Arts Symposium, Philadelphia, Pennsylvania.
- November 1992 "Changing How Graphic Design is Taught: 1980-1995", paper presented at the Small Computers in the Arts Symposium, Philadelphia, Pennsylvania.
- November 1991 "Can Art Be Taught on Computers?", paper presented at the Small Computers in the Arts Symposium, Philadelphia, Pennsylvania.
- June 1991 "Introduction to Desktop Publishing", noncredit course, Franklin Pierce Summer College, Rindge, New Hampshire.
- November 1990 "Traditional or Technological: a Graphic Design Educator's Dilemma", paper presented at the Small Computers in the Arts Symposium, Philadelphia, Pennsylvania.
- March 1990 "The Computer as a Graphic Design Illustration Tool", workshop presented at the Seminar on Art Department Computing, New Hampshire College and University Council, Rivier College, Nashua, New Hampshire.
- June 1988 "Graphic Production for the Layperson", noncredit course, Franklin Pierce Summer College, Rindge, New Hampshire.
- 1987 to 1997 "Get It Printed" and "Effective Communication", Elderhostel at Franklin Pierce College, Rindge, New Hampshire, and Inn at East Hill Farm, Troy, New Hampshire.
- August 1985 Workshop in Language and Thinking, Simon's Rock of Bard College, Great Barrington, Massachusetts.
- June 1985 "Introduction to Computer Literacy", Elderhostel at Simon's Rock of Bard College, Great Barrington, Massachusetts.
- 1984-1985 "Concepts of Design" and "Advertising and Newspaper Production", workshop classes for the staff of the Berkshire Eagle, Pittsfield Massachusetts.

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Additional Education

May 2013 - Attended University and College Designers Association's Design Education Summit, Chattanooga, Tennessee.

February 2002 — Attended Seybold Seminars, New York City.

March 1995 — Attended Seybold Seminars, Boston, Massachusetts, as Exhibitor for the Museum of Printing.

January 1995 — Attended Graphics Supershow, Boston, Massachusetts, as Exhibitor for the Museum of Printing.

August 1994 — Attended Macworld Expo, Boston, Massachusetts.

1993 and 1994 — Attended Seybold Seminars, Boston, Massachusetts.

March 1991 — What Artists Need to Know, workshop on safety issues in the arts, New Hampshire College and University Council, Dartmouth College, Hanover, New Hampshire.

August 1989 — Attended ACM SIGGRAPH Conference on Computer Graphics, Boston, Massachusetts.

April 1989 — Attended National Computer Graphics Association Annual Conference as educational scholarship recipient, Philadelphia, Pennsylvania.

June 1988 — Desktop Publishing Applications Workshop, Northeastern University, Boston Massachusetts.

April 1988 — Training Seminars on Teaching and Learning, New Hampshire College and University Council, Manchester, New Hampshire.

October 1987 — Conference on Critical Thinking, University of Chicago, Illinois.

October 1986 — NERComP Conference on Desktop Publishing, Trinity College, Hartford, Connecticut.

November 1985 — Workshop in Computer Graphics and Video, Teacher's College of Columbia University, New York City, New York.

1983-1984 — College courses in Microcomputer Graphics and Microprocessor Programming.

OUTDOOR WORK EXPERIENCE

Co-owner, Snow Star Farm Racing Siberian Huskies; 2002-present.

Breeding, training, and driving in various mid-distance sled dog races; bred and trained husky who ran 2012 Yukon Quest and completed 2013 Iditarod on a record-setting Siberian Husky team.

Full Certified PSIA Nordic Ski Instructor; 1984-present.

Telemark Ski Instructor, Loon Mountain, Lincoln, NH; 1997-1999.

Nordic Ski Director, Temple Mountain, Peterborough, NH; 1993-1997.

Managing the Cross Country Center, including ski school, rentals, grooming, telemark program.

Nordic Ski Instructor, Temple Mountain, Peterborough, NH; 1987-1993.

Teaching cross country and telemark lessons.

Nordic Ski Instructor, Butternut Basin, Great Barrington, MA; 1985-1986.

Teaching cross country and telemark lessons.

Nordic Ski Instructor, Cummington Farm Ski Touring Center, Cummington, MA; 1982-1985.

Teaching cross country lessons.

Cross Country Ski Program Director, Simon's Rock College, Great Barrington, MA; 1982-1986.

Senior Nordic Ski Patroller, National Ski Patrol System; 1978-1988.

Additional extensive camping, backpacking, skiing, dogsledding, and whitewater and flatwater paddling experience throughout the United States and Canada.

OUTDOOR TRAINING

Nordic Ski Instructor, Professional Ski Instructors of America.

Full Certification (Level III); 1984.

PSIA Associate Certification, 1982; registered member EPSTI, 1981.

Former member, PSIA-E Nordic Program and Development Committees.

Former co-chair, PSIA-E Nordic Marketing Committee.

Richard Block $Resumé \oplus Page 4$

OUTDOOR TRAINING (CONTINUED)

Mushing Boot Camp with Jamie Nelson and Ann Stead, Maine; 2008, 2009, 2011.

Telemark Ski Instructor, North American Telemark Organization; 1986-1997.

Ski Mountaineering and Winter Survival Instructor Training, National Ski Patrol System; 1979-1988. Advanced Ski Mountaineering and Avalanche Training, 1978-1979.

Whitewater Canoe and Kayak Training, Madawaska Kanu Camp, Ontario, Canada; 1979.

Whitewater Canoe Training, Nantahala Outdoor Center, Bryson City, NC; 1978.

Memberships & Volunteer Work

2011 to present — Member, Planning Board, Northern New England Sled Dog Trade Fair and Seminars; responsible for programs, posters, publicity.

1995 to present — Member: New Hampshire Mushers' Association, North Country Mushers, New England Sled Dog Club, Audubon Society of New Hampshire, Harris Center for Conservation Education.

1993 to 2001 — Member, Board of Directors, The Friends of the Museum of Printing, Incorporated, North Andover, Massachusetts.

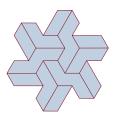
1992 to 2000 — Member, Contoocook and North Branch Rivers Local Advisory Committee, New Hampshire Department of Environmental Services.

1990 to 1998 — Member, Small Computers in the Arts Network, Philadelphia, Pennsylvania.

1989-1996 — Member, Conservation Commission, Antrim, New Hampshire.

1988 to 1996 — Member, National Computer Graphics Association, Fairfax, Virginia.

1987 to present — Member, New Hampshire Graphic Arts Association.



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Exhibit RB-2

Composite Map of Rejected and "New" Projects

COMPOSITE MAP OF REJECTED AND "NEW" PROJECTS Nonk Antrim ***6** 3,000 6,000 MANAGEMENT AND Feet ANTRIM WIND ENERGY LLC AWE Project Lands Antrim Wind Energy Project
Town of Antrim, Hillsborough County, NH * Proposed WTG **Rejected Project**

