

January 13, 2016

Robert Scott, Chairman
c/o Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

pamela.monroe@sec.nh.gov

RE: Docket No. 2015-02 Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility

Dear Chairman Scott,

Attached please find for filing in this matter the Motion to Intervene of the Stoddard Conservation Commission, Geoffrey T. Jones, chair.

Sincerely,

A handwritten signature in blue ink, appearing to read "Geoffrey T. Jones", with a long horizontal flourish extending to the right.

Geoffrey T. Jones, chair
Stoddard Conservation Commission
PO Box 336
1 Old Antrim Rd.
Stoddard, New Hampshire 03464

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Application for a Certificate of Site and Facility
By Antrim Wind Energy, LLC
SEC Docket Number 2015-02

MOTION TO INTERVENE *PRO SE* OF GEOFFREY T. JONES

Pursuant to the New Hampshire Site Evaluation Committee Rules Site 202.11 and RSA 541-A:32, Stoddard Conservation Commission, Geoffrey T. Jones, chair hereby moves for permission to intervene *pro se* in the above-referenced proceeding. In support of his Motion to Intervene, the Stoddard Conservation Commission, Geoffrey T. Jones, chair offers the following arguments:

Stoddard Conservation Commission, Geoffrey T. Jones, chair can demonstrate a substantial interest which may be affected by the outcome of the proceeding.

1. The town of Stoddard is the second largest town, by acreage, in Cheshire county, at 33,949 acres of which 21,431 acres (63% of the town) are permanently protected from development through the use of conservation easements or fee ownership of land by land trusts. Of the 63% protected lands, 6,518 acres (1/3 of all protected lands or 20% of the town) are in a "Forever Wild" designation.
2. These conservation lands collectively possess significant natural, ecological, and open space attributes which reflect the unique character of the Town of Stoddard and are of great importance to its residents. These Stoddard conservation lands are some of the most significant unfragmented habitat areas in southern New Hampshire, where species diversity is higher among both plants and animals than in surrounding lands and is exemplary in central New England (Van de Poll, March 2000 Management Plan of Stoddard Properties, prepared for Sweet Water Trust and the Society for the Protection of NH Forests and on file in their respective offices).
3. The conservation lands of Stoddard physically abut a collection of protected lands in several surrounding towns including: Washington, Windsor, Antrim, Hancock, Sullivan, Nelson, Harrisville, Gilsum, and Marlow, that represent over 40,000 acres of permanently protected conservation lands, affectionately known as the "Super Sanctuary".
4. The proposed Tuttle Hill wind tower facility lies in a 12,994 acres unfragmented forest block (roadless area), of which 3,582 acres of protected lands lies (nearly 1/3 of the unfragmented forest block). This undeveloped area of northwestern Antrim contains important ecological and habitat values that contribute to and are interconnected with the adjacent conservation lands. The conservation lands of interest and concern to the town of Stoddard are the recently protected lands of Robb Reservoir (1,700+) that abut the northwestern bound of Antrim, and the 3,400 acre Peirce Reservation that lies a mere 2 miles northwest of Tuttle Mountain.
5. A three+ mile (by 50-foot wide) access road to the wind tower site and 9 energy generating structures will have a profound impact on the interconnected conservation values of the northwest lands of Antrim AND the adjacent conservation lands in Stoddard (and adjacent towns), fragmenting important high elevation habitat (for certain species of birds) and splintering wildlife corridors (especially for bobcats), degrading their natural function.
6. Pitcher Mountain, located in the heart of Stoddard, offers the best 360° view for the effort, in southern NH. It is surrounded entirely by protected lands, lying in the center of one of the largest conservation easements in New England. Much of the view is rural, scenic, and uncluttered.....but in recent years this scenic view shed has been fragmented by dozens of cell towers, radio transmitters, the Lempster wind farm, and several ski areas that offer

night skiing. The dark skies of Stoddard have been compromised at night; the Tuttle Hill Wind Farm will dominate the view from the south.

7. During the prior case (SEC Docket # 2012-01) the SCC voted 4-0 that the SCC request intervener status and received a letter of support from all three Stoddard Selectmen. We will garnish the same support for Docket No. 2015-02 Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility. This petition seeks to protect the integrity of the conservation lands of "Super Sanctuary" that will be impacted by this project if it comes to fruition, by seeking less intrusive alternatives and/or more appropriate locations.

The interest of Stoddard Conservation Commission, Geoffrey T. Jones, chair will not be adequately protected by other parties.

In exercising its discretion, I respectfully ask that the Committee consider whether the party's interest will be adequately protected by other parties. Since I, as a resident of the Town of Stoddard, on behalf of the Stoddard Conservation Commission, chair, in close proximity to where the proposed wind facility would be constructed, am concerned that Stoddard's interests have not been addressed thus far by the Town Boards of Antrim, I do not believe that any other party to this proceeding can adequately represent my interests in proceedings before the Committee.

The intervention of Stoddard Conservation Commission, Geoffrey T. Jones, chair will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.

The Stoddard Conservation Commission petitioned for and was granted Intervenor status in Antrim Wind Energy, LLC's prior case before the Committee (SEC Docket # 2012-01) and as such understand and respect the hearing process.

Pursuant to the SEC Order of December 4, 2015, Stoddard Conservation Commission, Geoffrey T. Jones, chair files this Motion to Intervene by the deadline set forth by the Committee for Docket 2015-02 and requests that I be permitted to intervene with full standing to participate in all phases and activities of the proceeding. I respect the importance of conducting this proceeding in an orderly manner that will not unduly delay the Committee or the parties in reaching an outcome. I am prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offer that my participation, if permitted, would be in the interest of justice.

Dated this 13th day of January, 2016.

Respectfully submitted,



Geoffrey T. Jones, chair Stoddard Conservation Commission
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Stoddard, NH 03464
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