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January 14, 2016

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Pamela G. Monroe, Administrator  
New Hampshire Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301

RE: Docket 2015-02 (Antrim Wind Energy, LLC)

Dear Ms. Monroe,

Attached please find for filing in this matter my appearance on behalf of the Audubon Society of New Hampshire and the organization's Petition for Intervention.

Sincerely,

Carol R. Foss  
Senior Advisor for Science and Policy

Cc: Service List via e-mail or first class mail  
Attachments/Enclosures

THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE

Docket No. 2015-02

Re: Antrim Wind Energy, LLC

PETITION FOR INTERVENTION  
BY AUDUBON SOCIETY OF NEW HAMPSHIRE

NOW COMES the Petitioner, the Audubon Society of New Hampshire ("ASNH"), by its undersigned representatives, and respectfully petitions the New Hampshire Site Evaluation Committee ("the SEC" or "the Committee") to grant it leave to intervene in these proceedings pursuant to NH Code of Administrative Rules, Site 202.11, and RSA 541-A:32. In support of its petition, ASNH states as follows:

1. ASNH is a New Hampshire voluntary corporation and a tax exempt charity under §501 (c)(3) of the Internal Revenue Code with a place of business at 84 Silk Farm Road, Concord, NH 03301.
2. This Petition is filed in response to an application filed by Antrim Wind Energy LLC ("AWE") on or about October 2, 2015 seeking a certificate of site and facility for a 28.8 megawatt electrical generation facility consisting of nine Siemens SWT-3.2-113 direct drive wind turbines and associated civil and electrical infrastructure (the "Proposal") proposed to be sited in the southwest portion of Antrim, New Hampshire (the "Proposed Site").
3. ASNH is, among other things, a conservation land trust. Its mission statement declares that ASNH "is to protect and enhance New Hampshire's natural environment for wildlife and for people."

4. ASNH successfully sought intervenor status in the three previous AWE proceedings (SEC Dockets 2011-02, 2012-01, 2014-05).

5. ASNH is a direct abutter of the Proposed Site; its largest fee-owned property, the dePierrefeu-Willard Pond Wildlife Sanctuary, a 1,659-acre wildlife sanctuary in Antrim and Hancock, New Hampshire (the "Sanctuary"), is immediately adjacent to the Proposed Site. In addition, ASNH protects another 1,126 acres abutting the sanctuary, which are subject to conservation easements held by ASNH.

6. The Sanctuary was created in 1967 with the generous donation by Elsa Tudor dePierrefeu to the National Audubon Society of 650 acres of lands and the caretaker's cabin on the shore of Willard Pond with the condition that the land be maintained as a wildlife sanctuary. Soon thereafter the National Audubon Society transferred the property to ASNH. Over the next 44 years, with the generous contributions of lands and conservation easements by members of Ms. dePierrefeu's family and others, as well as purchases of lands and conservation easements by ASNH with the financial support of its members and the public, a federal Forest Legacy grant, and the assistance of the Harris Center for Conservation Education (the "Harris Center"), the lands protected in and around the Sanctuary by ASNH have grown to the total of 2,785 acres. ASNH has also assisted the Harris Center in the protection of some of the lands described below.

7. The Sanctuary is managed primarily for wildlife habitat, with environmental education, passive recreation by the public, including fishing, canoeing, hiking, wildlife observation, nature study, and forest management among its additional uses.

8. The Sanctuary is accessible only from a gravel road. Wholly within the Sanctuary's borders is the 96-acre Willard Pond, which as a "great pond" is owned by the State of New Hampshire. The public enjoys the pond for fishing, canoeing, kayaking, and use of electric motorized boats. The pond provides breeding habitat for Common Loons among other wildlife species, offers scenic views of surrounding hills, including the Proposed Site, and provides a quiet setting for viewing, listening to, and otherwise enjoying the natural environment.

9. The Sanctuary also includes Bald Mountain (elevation 2,030 feet) and Goodhue Hill (elevation 1,620 feet), which are accessible by foot from Sanctuary trails. Bald Mountain offers scenic panoramas, including views of Mt. Kearsarge, Mt. Washington, Robb Mountain, the Mink Hills and Lowe State Forest, Craney Hill (Pat's Peak), the southern Lakes Region's hills, the Ossipee Range, the Pawtuckaway Range, the Proposed Site, Mt. Monadnock, the nearer hills in Hancock (Mts. Thumb and Skatutakee), Nubanusit Lake and the Wapack Ridge (North Pack Monadnock to Mt. Wachusett in Massachusetts). Goodhue Hill also provides scenic panoramas, including views of Mt. Kearsarge, Mt. Cardigan, a partial view of Mt. Sunapee, Mt. Monadnock, Pack Monadnock, Mt. Wachusett in Massachusetts and the Proposed Site.

10. The Sanctuary's importance as wildlife habitat and a recreation site are enhanced because the Sanctuary and other conserved and wild lands surrounding it form a large unfragmented block of wildlands. In addition to the Proposed Site, the Sanctuary abuts the 73-acre Hosmer Wildlife Management Area managed by New Hampshire Fish and Game (which also abuts the Proposed Site) and, to its south in Hancock, the 475-acre Carpenter Marsh Wildlife Management Area managed by Fish and Game. Other protected lands within three miles of the Proposed Site include, upon information or

belief, 2,130 acres of lands owned by the Harris Center, another 4,650 acres of lands subject to conservation easements held by the Harris Center (excluding lands proposed to be protected by agreement between the Antrim Wind Power and the Harris Center), the 613- acre Loveren's Mill Cedar Swamp Preserve protected by The Nature Conservancy, and the 5,000-acre Peirce Reservation of the Society for the Protection of New Hampshire Forests in Stoddard and Windsor.

11. The more than 2,785 acres of lands protected by ASNH described above, together with the Proposed Site and the lands protected by other conservation organizations described above, provide important habitat for wide-ranging wildlife species, including bobcat, moose, and black bear and a diversity of species of woodland and water birds, including Hermit and Wood thrushes, numerous species of warblers, Barred and Saw-whet owls, Belted Kingfisher, Spotted Sandpiper, and the State-threatened Common Loon, which nests on the pond. The Bald Eagle, another State-threatened species, nests on nearby Nubanusit Lake and frequently visits Willard Pond Wildlife Sanctuary. More than 100 species of birds use the Sanctuary for foraging or nesting over the course of the year. For all of these reasons the Sanctuary constitutes an important conservation property for the region and the State of New Hampshire.

12. The Proposal's intrusion into views from the Sanctuary and from Willard Pond will also adversely affect the public's use and enjoyment of the area. The appearance of moving turbine blades above the nearby ridgeline will be a substantial distraction to individuals recreating on Willard Pond.

13. The NH Wildlife Action Plan, which was developed by the NH Fish and Game Department with the assistance of numerous partner agencies, organizations, and institutions, formally approved by the US Fish and Wildlife Service in 2006, and revised in 2015, identifies most of the Proposed Site as highest ranked habitat in the State.

14. ASNH supports increased use of environmentally sound renewable energy resources but believes that siting decisions for renewable energy facilities must carefully balance the energy benefits with impacts to recreation and wildlife and other natural resources.

15. In carrying out its mission of protecting New Hampshire' environment, ASNH has adopted a wind energy policy pursuant to which it intends to review applications for New Hampshire wind energy projects for their impacts on wildlife and the environment, and therefore has an interest in this Proposal that is in addition to the impact on properties protected by ASNH.

16. The Proposed Site has repeatedly been identified as an area of particular conservation interest, largely because it is at the core of an unfragmented forest block which is unusually large for the area. The significance of this area has been recognized at many levels, locally and regionally.

17. Locally, it is noteworthy that most of the Proposed Site is within the Antrim Rural Conservation Zone, in which this use is not permitted by right or by special exception. This zoning district was adopted by Town Meeting in the late 1980s to protect rural character and conservation values, and has been reaffirmed by adoption of the Antrim Open Space Conservation Plan in 2006, adoption of the Town Master Plan in 2010, and by votes on proposed ordinance revisions in 2011, 2012, 2013, and 2014.

18. Regionally, the Quabbin to Cardigan Partnership, a bi-state coalition of twenty-eight conservation organizations and agencies in Massachusetts and New Hampshire, has identified priority conservation areas over a large landscape area extending from north-central Massachusetts through western New Hampshire to the White Mountains. A major portion of the Proposed Site falls within a "core conservation area" and another portion qualifies as "supporting landscape" to that core area.

## CONCLUSION

19. Because of the Proposal's anticipated impacts on an extensive unfragmented forest area of local, regional and State importance, to which an ASNH property and multiple conservation easements contribute, and anticipated impacts on users of a property that ASNH holds in trust for the people and wildlife of the State of New Hampshire, ASNH opposes the Proposal.

20. For the foregoing reasons, ASNH seeks intervention as of right pursuant to RSA 541-A:32, I, and Site 202.11 (b) on the following grounds:

- (a) As set forth in this Petition, ASNH has substantial rights, interests and duties that will be affected by the proceeding;
- (b) Granting this Petition would serve the interest of justice; and
- (c) The participation of ASNH will not impair the orderly and prompt conduct of the proceedings, as ASNH has demonstrated in prior dockets.


Request for Relief

WHEREFORE, ASNH respectfully requests that the SEC issue an order granting its petition for intervention and granting such other and further relief as it deems appropriate.

Respectfully submitted,

**AUDUBON SOCIETY  
OF NEW HAMPSHIRE**

Date: 14 January 2016

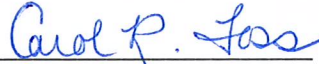


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By: Michael J. Bartlett, President  
84 Silk Farm Road  
Concord, N.H 03301-8206  
MBartlett@NHAudubon.org  
(603) 224-9909

Certificate of Service

I hereby certify that on this date I have sent the within Petition for Intervention via electronic mail to the persons named on the Service List of this Docket.



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Carol R. Foss  
Senior Advisor for Science and Policy



THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE

Docket No. 2015-02

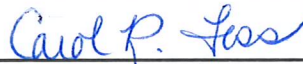
Re: Antrim Wind Energy, LLC

**APPEARANCE**

Pursuant to New Hampshire Administrative Rule Site 202.04, please enter my appearance on behalf of the Audubon Society of New Hampshire (ASNH), pro se. I am not an attorney. From time to time and on an as needed basis other individuals, including, but not limited to, Michael Bartlett and Margaret Watkins, also not attorneys, may represent ASNH at proceedings in this matter. However, in all cases, communications should be directed to the undersigned Dr. Foss.

Respectfully submitted,

**AUDUBON SOCIETY OF NEW HAMPSHIRE**



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Carol R. Foss, Ph.D.  
Senior Advisor for Science and Policy  
84 Silk Farm Road  
Concord, NH 03301  
603-224-9909 x331  
[cfoss@nhaudubon.org](mailto:cfoss@nhaudubon.org)

**Certificate of Service**

I hereby certify that a copy of the foregoing was this day forwarded by electronic mail to the persons named on the Service List of this docket.



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Carol R. Foss