Final 2015-02 SEC Brief Stoddard Conservation Commission November 20, 2016

3 4

5

6

7

8

1

2

The Stoddard conservation commission believes that there is no significant difference in the environmental impacts between the 2015 Docket submitted by AWE and the 2012 Docket, which was denied. We believe that the 2015 Docket should be **denied** for the following additional reasons:

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

1. Six conservation groups and two state agencies have engaged in a 40+ year effort to identify and protect over 40,000 acres of contiguously protected lands adjacent to and surrounding the proposed AWE wind farm. Preserving large, unfragmented forest blocks from further development is central to the mission of each group. The organizations involved include the following: Society for the Protection of NH Forests, NH Audubon, Harris Center, The Nature Conservancy, Trust for Public Lands, Sweet Water Trust, NH Fish & Game Dept., and the NH Division of Forest and Lands. Millions of dollars of private and public funds have been spent on this initiative. Allowing the AWE wind farm to be developed would undermine the conservation and aesthetic values of this effort. Furthermore, these lands lie in the heart of the Ouabbin-to-Cardigan Initiative (O2C), a two state effort to protect ecologically significant forests in central New England. Habitat conservation in this region is a high priority for both the Massachusetts and New Hampshire Wildlife Action Plans, and the region's interconnected forests could also prove an important north-south corridor for wildlife adapting their ranges to a changing climate. Its managed timberlands are an important source of forest products and renewable energy, and are a highly-efficient carbon sink. Please deny this project on

these grounds alone;

39

40

44

45

46

47

48

49

50

51

- 2. The NH Fish & Game's Wildlife Action Plan (WAP) is a public/private effort to identify 28 critical habitat throughout the state that is necessary for not only species of concern, 29 but for all wildlife, to thrive/survive in a state that continues to see 10 to 15,000 acres 30 of forest and agricultural land lost to development each year. The WAP has ranked the 31 AWE wind farm site as the highest ranking habitat (confirmed by field visits by the 32 Stoddard con com AND from GPS collared bobcats in the UNH/F&G bobcat study). This 33 cooperative effort between state agencies, conservation groups, and academia has cost 34 over one million dollars in public and private funds. Its purpose is to guide land use 35 decisions so that critical wildlife habitat is NOT developed. The SEC is a prime 36 example of decision makers this plan was intended for: Please honor the WAP by 37 denying this project! (NH wildlife biologists say that this high ranking is grounds 38
- 3. Master plans are the icon of local control and citizen involvement! The Antrim master 41 plan identified the northwest part of town as important open space and zoned it 42 rural/conservation. The Antrim selectmen's action is contrary to and in violation of this 43 important local planning initiative. Please honor and restore the integrity of the
 - town's master plan effort by denying this project;

enough to deny the project);

4. We all want to mitigate the insidious impacts of greenhouse gases and climate change. Forests play a key role in sequestering carbon and moderating temperatures. It is critical that large, unfragmented forest blocks remain free of incremental development in order to maintain their ecological integrity and economic and operational viability. Forest fragmentation (converting forests to non-forest use with roads, transmission Page 2 of 4

lines, subdivisions, commercial/industrial development) degrades wildlife habitat, leads to loss of biodiversity, increases invasive plants, insects, and pathogens AND threatens the health, function, and value of the remaining forest! Forest health depends upon maintaining ecological health, of which apex predators are a critical part. The AWE wind farm is being proposed in habitat that the WAP has identified as being core habitat for apex predators (bobcats, bear, coyotes, fisher). The biggest threat to their habitat is fragmentation, which projects like the proposed AWE farm are a poster child of. **Please**deny this project in recognition of the importance of these large forest blocks in mitigating climate change;

5. The Stoddard conservation commission (with over 100 years of applied, practical natural resource experience) and the selectmen stand unanimous and united in their opposition to the AWE wind farm, because of the threat to the conservation values of protected lands in Stoddard (65% of the town's area) and the surrounding towns;

6. Tuttle Hill is a marginal wind site at best; wind energy is a marginal energy source with 30% efficiency/reliability, at best! It requires a constant standby of conventional energy sources to compensate for wind lulls (coal, oil, natural gas, hydro); it poses a tremendous challenge to those who manage the grid!

7. If we believe that wind farms should be a viable part of our renewable energy portfolio, then they should be <u>sited on ridges where they pose the least</u>

<u>environmental threat, not the greatest</u>. Locating a wind farm on Tuttle Hill would pose a huge threat to the current and future conservation values and efforts in this area, for all of the aforementioned reasons.

The Stoddard conservation commission recognizes that "in the field of conservation, victories are temporary; defeat is permanent" and that we need to be eternally vigilant in protecting the conservation and aesthetic values of this region from ill-sited development projects, of which this is one. Mitigation is not an option in this case!

The Stoddard conservation commission respectfully requests that the AWE wind farm (Docket 2015-02) be denied for any one or all of the above reasons.

Respectfully submitted,

Geoffrey T. Jones, chair (licensed professional forester #151)