

August 8, 2016

Robert Scott, Subcommittee Chairman
New Hampshire Site Evaluation Committee
c/o New Hampshire Department of Environmental Services
29 Hazen Drive -- P.O. Box 95
Concord, New Hampshire 03302-0095

Re: Antrim Wind Energy LLC - SEC Docket No. 2015-02

Dear Commissioner Scott and members of the Site Evaluation Committee,

I am writing to comment on the proposed Antrim Wind Energy LLC (AWE) project currently under review by your committee. The New England Forestry Foundation (NEFF) is a non-profit land conservation organization founded in 1944. Our overall assessment of the Antrim project is that because of the substantial mitigation measures, which include protection of over 900 acres at the site and the removal of the nine turbines after fewer than 50 years of operation, the project would not seriously compromise the long-term conservation values or the vision for protection of the large forest block where the turbines would be located.

NEFF owns and manages 11,163 acres comprising 47 community forests in New Hampshire, more than 40 per cent of the nearly 27,000 acres that NEFF owns in five New England states. NEFF also holds conservation easements on 1,148,316 acres owned by 155 landowners, with 12,833 acres of those permanently protected lands located in New Hampshire on 55 properties. As part of the mitigation package for the proposal, AWE is committed to adding over 900 acres to lands already protected in the large forest block that includes the Antrim site, thus preventing further fragmentation of the forest and its wildlife habitats. Conversely, if the project is not approved, several of the landowners who are under agreement to convey conservation easements to the Harris Center and to the Town of Antrim have indicated that they would not be inclined to protect their land and, in fact, might pursue development opportunities. AWE also has pledged to contribute a substantial fund to NEFF to protect land in the vicinity of the proposed wind generation project as additional mitigation if the project is constructed.

NEFF would like to make an important observation that most other commenters have not: while the proposed turbines would be temporary, the conservation of more than 900 acres of forested land would be permanent. Per AWE's signed agreement with the Harris Center, the turbines would have a lifespan of fewer than 50 years, less time than it takes for a red oak



seedling to reach the size of a dominant canopy tree. The turbines, in fact, would advance the protection of this large forest block, which is deemed a priority focus area by the Quabbin to Cardigan collaborative, of which NEFF is a founding and active member. We acknowledge that the turbines would have some short-term adverse impacts (as cited in the Nature Conservancy of New Hampshire's comments sent to you by letter dated April 8, 2016), but NEFF finds that those impacts are acceptable when considering the many long-range conservation advantages, including permanent land conservation and carbon offsets, of generating electricity from renewable sources at the Antrim site.

Thank you for considering these comments as part of your deliberations over a complex proposal.

Sincerely,

Robert Perschel
Executive Director