



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

June 17, 2016

Motion for rehearing

On behalf of McKenna's Purchase Unit Owners Association ("MPUOA") we hereby seek rehearing of the Site Evaluation Sub-Committee's order dated May 20, 2016 regarding intervention in order to obtain full individual group status.

On March 18, 2016, the Presiding Officer recognized that MPUOA, as well as other intervenors, are concerned about the effect of the Project on the views and value of their property, their style of life and enjoyment of their property, wildlife and environment, wetlands, and health and safety. They also express their concerns about the effect that noise associated with the Project may have on their life and enjoyment of their property. Order p. 23-24 (emphasis added). Because MPUOA has "a profound and substantial interest in the outcome of these proceedings," its petition was granted. Order 23-24 It sought review by the Sub-Committee but was not granted full intervenor status.

We raise a unique issue related to wildlife and environment. The path of the project over the property owned by the MPUOA is the only habitat in New Hampshire for the Karner Blue butterfly. The Karner Blue is both a federal and New Hampshire endangered species. The members of the MPUOA have tended to the Karner Blue's habitat, the Pine Barrens that the project seeks to use. There is no other intervenor similarly situated. The failure to provide full party status will prevent the MPUOA from protecting an interest that formed the basis of intervention. See N.H. CODE ADMIN. R. ANN. Site 202.11(d).

In addition, the MPUOA is in the process of hiring counsel. Counsel's ability to represent the one hundred and forty eight members of the MPUOA will be hampered by the presence of six other property owners in Ashland, Northfield, Canterbury and Deerfield (Laura Bonk). The two properties in Concord are an Equestrian Center and a single family residence, both near Canterbury. None of the other properties share MPUOA's unique position as a location of one hundred and forty eight townhouses.

For example, document 434 reflects an attempt by the original group to take a position. Of the 16 members only 9 responded. One of the nine responders took a different position than the other eight.

For these reasons and for the reasons raised in MPUOA's earlier motions, we request that we be given full individual group status.

Notice of this filing was sent to the current members of the group; only one responded.

Respectfully Requested,

Michelle Kleindienst
Association Manager
McKenna's Purchase Unit Owners Association

Cc: Copies of this request have been sent via email to the SEC email listing for the above listed Docket as posted on the SEC website on June 17, 2016