

24 July 2021

Mr. Jonathan A. Evans, Chair  
NH SEC Subcommittee  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

Dear Mr. Evans: (and members)

Re: SEC 2021-02.

Any serious plan to measure noise exceedances must start by acknowledging that weather is the primary, secondary, and tertiary determinant of that noise. AWE, and your Subcommittee, must acknowledge ***that turbine sound exceedances will always, and only, occur in special weather situations, and that these special weather situations are well known.*** Sound measurements, and their discussion, in ***other*** weather situations are mostly meaningless, and irrelevant to your mission.

Your Subcommittee was charged with setting the parameters for measuring sound levels in the AWE neighborhood, and most importantly, whether, and how often, their turbine noises may exceed the 40 Db level. AWE has attempted to misdirect you by submitting a multi-page argument which is heavy on legalese, arguing the minutia of measuring techniques, but deliberately ignoring the most important factors that make excessive noises. Their egregious misdirection included measuring noise when the weather made noise exceedances very unlikely. Worse, the SEC hired a so-called expert (Tocci), who measured noise levels on nights when meteorological conditions could never produce exceedances!

Is it believable that AWE has NOT made a few sound measurements on nights when the weather is most likely to generate and broadcast the loudest turbine noises to the neighbors? It would have been a trivial expense to make such measurements, compared to the time and money of these hearings. Might the intensity with which AWE has hammered on the 1-hour averaging indicate that they ran my suggested test, and that there are many, at least on/off, noises over 40 Db. AWE would know whether such averaging is necessary to squeeze their noise exceedances under the 40 Db level. If there were no noise exceedances over 40 Db, then why have they wasted their, your, and our time? What is their minimum averaging interval necessary to squeeze their many very loud noises under 40 Db? Does their 1-hour averaging still leave some exceedances, and if so how many, and how often?

Once you return to the real issues of extreme sounds, ***caused by extreme combinations of weather***, all the ANSI “standards”, become secondary (irrelevant?) because they were not developed for, and do not necessarily apply to, either the extreme weather at issue, or to the special topography of the hills in Antrim. The “real standards” that apply to extreme noise from the operating AWE turbines can be easily determined. AWE is the only entity which has access to all the required data, especially the sound and wind at the turbines, and when combined with publicly available weather data, should be able to determine, if, when, and how often, their turbines will deliver excessive noise to their neighborhood. AWE has always claimed they could lower the turbine sounds, if and when necessary, and the extreme weather (for noise) can be easily forecast.

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