tel: 207-892-6691 **Stephen E. Ambrose** email; seaa@myfairpoint.net
15 Great Falls Road, Windham, ME 04062
Acoustics, Environmental Sound & Industrial Noise Control

July 29, 2021

VIA ELECTRONIC MAIL

Jonathan Evans, Presiding Officer
New Hampshire Site Evaluation Committee
21 Fruit Street, Suite 10
Concord, New Hampshire 03301

Re: Compliance Assessment Review - Errors and Omissions
Docket No. 2021-02, Antrim Wind Energy Facility

Dear Mr. Evans and Committee Members:

I respectfully advise that Antrim Wind Energy (AWE) compliance reports have errors and omissions that when corrected changes the conclusion to non-compliance. These errors may be an attempt to show an averaged '*mathematical*' compliance rather than Rule based non-compliance.

AWE's noise consultant Rob O'Neal may have *conflicts-of-interests* by co-chairing the "*The Wind Turbine Noise Technical Activity Committee"* with Ken Kaliski. Note that this committee's mission *"is focused on the education of INCE members and the broader community on wind turbine noise, its generation, control, prediction, policy and regulation. It serves as a professional forum for the exchange of technical ideas and the dissemination of science-based information. It supports the promotion of unified practices for noise measurement, modeling, and other related topics* ..." [1]. This committee can stifle opposing opinions by taking control of wind turbine assessments for public hearings and boards.

Errors and omissions are with ANSI S12.9 Part 3 - Short-term Measurements with an Observer Present [2]. Epsilon, Acentech, and Cavanaugh Tocci exhibit *groupthink*. Ignored definition §3.5 '*dominant*' [3]: levels that are audibly louder than all other sounds by ≥ *6* dB. Omitted §6.4 (b)(1) *initial data collection,* required to confirm *steady* sources (≤ 3 dB) [4]. Misused §6.5 (b)(1) that is only applicable for *steady*' sources to remove ambient background. Wind turbines are non-steady '*dominant*' sound source(s). Noise compliance is determined from '*dominant*' sound source measurements without adjustments.

Epsilon made assurances during permitting that the predicted loudest wind turbine noise would not exceed 38 dBA. Post-construction noise measurements are louder than 40 dBA. These are attributed to natural wind. This makes no sense when ambient background levels are less than 30 dBA.

Please feel free to contact me. Thank you.

Respectfully, Stephen E Ambrose

Stephen E. Ambrose, ASA, *INCE, 1981 Board Certified, emeritus*

1. https://www.inceusa.org/about-ince-usa/technical-activities/, bottom of page
2. ANSI/ASA S12.9-2013 - Quantities and Procedures for Description and Measurement of Environmental Sound – Part 3: Short-term Measurements with an Observer Present, Acoustical Society of America, Melville, New York.
3. §3.6 *dominant sound, when heard among other sounds, that is audibly louder than all other sounds combined, and that causes a change of the indicated sound pressure level (measured using approximately a 0.1 s time average or a fast time weighting) of at least 6 decibels (dB) with the audible fluctuations corresponding to the visible fluctuations of the indicated sound pressure levels.*
4. §6.4 *initial data collection, (b) The characteristics of the source(s) and type of operation shall be examined to determine if: (1) the sound pressure level of the source is essentially steady with time (e.g., cooling tower, electric power transformer, or diesel generator), or (2) the sound pressure level of the source varies with time (e.g., cycling window air-conditioner, steam over-pressure valves, jet engine test cell, construction cranes, bulldozers, and forklift trucks).*