June 3, 2013

Town of Alexandria
Board of Selectmen
47 Washburn Road
Alexandria, NH 03222

Re: Appalachian Mountain Club’s comments on EDP Renewables’ building permit application for a wind farm met tower

To the Selectmen:

The Appalachian Mountain Club (AMC) is writing to express our support of your position in opposition to industrial scale wind power development in the town of Alexandria, as set forth in your letter of March 27, 2013 to the New Hampshire Site Evaluation Committee. We have significant concerns about the appropriateness of siting commercial-scale wind power projects in the town (see below). We respectfully request you consider denying EDPR’s permit for a met tower if there is a legal basis for doing so.

The AMC shares your concern about the proliferation of wind power development proposals in the Mount Cardigan – Newfound Lake region. We are particularly concerned about Iberdrola’s proposed Wild Meadows Wind Farm and EDP Renewables’ proposed Spruce Ridge Wind Farm. We present the following information in the belief that it may be useful to you in future discussions about these projects.

The AMC is the oldest conservation and recreation organization in the country, with 100,000 members, supporters, and advocates from Maine to Washington, DC, including more than 10,000 here in New Hampshire. Most notably, we own and operate Cardigan Lodge and Reservation in Alexandria adjacent to Cardigan Mountain State Park. Our property abuts the Maxam property on which the EDPR project is being developed.

Built by the AMC as one of New Hampshire's first ski lodges and newly renovated in 2005, Cardigan Lodge is set on a 1,200-acre reservation that has been owned and managed by the AMC for over 75 years. Cardigan Lodge offers an extensive trail network for hiking and cross-country skiing, including easy access to Cardigan Mountain; a nature trail and swimming pond; and family-friendly programs and theme weekends. Over 50 miles of hiking and ski trails on our reservation, Cardigan Mountain State Park and surrounding private lands are maintained by AMC (Appendix 1). AMC’s Cardigan Lodge also hosts and runs numerous environmental education programs for
children and youth – a chance for kids to experience and learn about the natural world using the forests, mountains, and trails as an outdoor classroom. AMC recently invested about $1.5 million in our Cardigan facilities. Cardigan Reservation abuts the 5,655-acre Cardigan Mountain State Park, a well-known and heavily used recreational resource of state significance. Both AMC’s land and facilities and Cardigan Mountain State Park are open to the public.

In addition, AMC owns and operates High Cabin, located on the upper slopes of Cardigan Mountain. For over 80 years, High Cabin has been a popular and rustic retreat for backcountry enthusiasts looking for a secluded escape with breathtaking scenery. Built in 1931 and renovated in 2004, High Cabin provides a unique small group, self-service, backcountry trip experience. High Cabin is less than half a mile from the spectacular sunrise/sunset viewing and uncompromised stargazing from Cardigan Mountain’s summit.

Cardigan Mountain State Park spans 5,655 acres and is an excellent area for hiking, snowshoeing, and skiing. Cardigan Mountain's 3,121-foot extensive treeless granite summit (the second highest peak in the state south of the White Mountains, just a bit shorter than Mount Monadnock) affords outstanding views of west-central New Hampshire, with a panorama that includes Mount Monadnock and the White Mountains, Camel's Hump in Vermont, and Pleasant Mountain in Maine. The summit of Cardigan Mountain and its fire tower are frequented year-round by thousands of visitors each year.

The AMC is extremely concerned about these proposed wind farm developments. They have the potential to adversely impact this undeveloped area and compromise the very reason why the public comes to use AMC’s Cardigan facilities and Cardigan Mountain State Park. The proposed construction of industrial-scale wind farms in such close proximity to our Cardigan facilities and to Cardigan Mountain State Park would likely significantly degrade the quality of the visitor experience. Guests come to both AMC’s facilities and Cardigan Mountain State Park in large part because of the high quality scenery. The proposed projects represent a serious threat to both AMC and a state-owned asset of major significance.

In addition, there is potential for significant cumulative impact to the Cardigan experience from existing (Iberdola’s Groton wind farm) and proposed projects. Cumulatively, these projects would represent the conversion of a natural landscape experience into a human-dominated, industrialized landscape experience spanning a viewshed of nearly 180° from most viewpoints in Cardigan Mountain State Park and the summit of Cardigan Mountain.

If and when these proposed projects come before the Site Evaluation Committee, the AMC will be an active participant in the permitting process.
The New Hampshire Site Evaluation Committee website lists “Proposed wind power siting guidelines”. AMC led the multistakeholder effort to develop these guidelines. They are intended to guide appropriate wind power development in the state, describing conditions that represent lesser to more serious concern for a wide range of natural and social resource values. What follows are excerpts from Appendix A.9 (Visual Impacts):

- **Definition:** “Visual impacts” refers to any change in the visual character of a landscape that degrades the aesthetic quality of the landscape from one or more viewpoints. As considered here, visual impacts fall into two basic categories: 1) impacts to public recreational or scenic sites or facilities that depend on a relatively naturally-appearing landscape, and 2) impacts to towns, village centers, and residential areas.

- **Pertinent Existing New Hampshire Laws and Regulations:** NH RSA 162-H specifically recognizes aesthetic quality as a factor that must be considered in permitting of energy facilities. The third of the four criteria set forth for approval is that the site and facility “Will not have an unreasonable adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety.”

- **Grounds for Concern:** Undeveloped forest landscapes are an important component of both the state’s economy (as they form the backdrop for outdoor recreation) and its quality of life (especially for rural communities). While there are diverse opinions on the aesthetic qualities of modern wind power facilities, they can be a dominant and potentially discordant element within undeveloped forested landscapes.

- **Relative Level of Concern**
  - **Low:** Project would not be a prominent feature from any visually sensitive viewpoint. Where visible, it is either seen in the background and is not a dominant feature of the landscape, or is viewed in the context of other human development and landscape modifications.
  - **Moderate:** Project may be visually prominent feature from one or more visually sensitive viewpoints but is not an incongruous element in an otherwise relatively naturally-appearing landscape.
  - **High:** Project is a visually prominent feature within the fore- or mid-ground of one or more visually sensitive viewpoints and may be considered an incongruous element within an otherwise relatively naturally-appearing landscape.

The iconic and popular summit of Cardigan Mountain and its fire tower, and the views they provide, are unquestionably resources of high state significance, which is why this area has been protected as a State Park. The immediate proximity of these industrial-scale wind farms in the region would without question dominate and negatively impact this state resource at the highest level of concern as outlined in the above siting guidelines. We believe these projects would have a similar impact on the facilities that AMC operates for the public.

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Currently these guidelines are merely that – guidelines that developers are free to consider or ignore as they see fit. AMC has been working in the current legislative session to promote legislation that would require the SEC to develop more specific criteria for the approval of energy projects. This legislation (SB99) has been unanimously approved by the House Science, Technology and Energy Committee and we expected it to be approved by the full House and Senate.

If there is additional information that we can provide please don’t hesitate to contact me at 603-664-2050 or sarnold@outdoors.org.

Sincerely,

Susan Arnold
Vice President for Conservation