January 30, 2013

Groton Planning Board
754 North Groton Road
Groton, NH 03241

Re: Re-opened public hearing regarding a request by EDP Renewables (Lessee), EXPX2/MAXAM (Owner) for site plan review to permit placement of a 60 meter meteorological weather tower adjacent to Hardy Country/Spruce Ridge Road (Map 5 Lot 164).

Dear Chairperson and members of the Groton Planning Board:

The Appalachian Mountain Club (AMC) offers the following comments to the re-opened public hearing on the above-referenced application.

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. Specific to the matter before you, we own and operate Cardigan Lodge and Reservation in the adjacent town of Alexandria, NH. Though AMC’s property is not in Groton (see Appendix 1), we received official notice of this hearing as an abutter to the Maxam property in Alexandria. Given the long-term history and presence we have in the Cardigan region, we feel the need to weigh in with the Planning Board at this time.

We are not aware if the Planning Board has made a determination as to whether the application has been determined to be a “development having regional impact” under Section VII of the town’s Site Plan Review Regulations. However, we believe that a structure nearly 200 feet tall that would be visible from adjacent towns and from recreational areas of high statewide significance (particularly the summit of Cardigan Mountain) clearly qualifies under criteria D.4 set forth in Appendix 1 of the Site Plan Review Regulations. It is in that context that we offer these comments.

AMC opposes the approval of this site plan application. The proposed project is inconsistent with one of the primary purposes of the Site Plan Review Regulations “to avoid development which may result in negative environmental impacts”, and cannot satisfy the landscape design guidelines set forth in Section X.K of the Site Plan Review Regulations intended to “preserve and enhance the appearance and natural beauty of the Town and to protect property values” and “to provide privacy from...visual intrusion”. The proposed application for a met tower is but the first step in the process towards development of a project that would be extremely damaging to scenic resources of major statewide value and historic significance. (We recognize that it is only the met tower...
application, and not the subsequent wind power development, that is before the Planning Board at this time. However, we do not believe that the current application can be considered in isolation from the larger subsequent project that it is designed to facilitate. The decision to permit this met tower will have significant regional ramifications and should consider impacts beyond just those within the boundaries of Groton).

It is important to note that the AMC did not oppose the existing Groton wind farm in the northern part of the town. While we had concerns about that project, it was sufficiently distant from our property and from Cardigan Mountain State Park that our concern did not rise to the level that would lead us to opposition. However, the currently proposed project is much closer to our property and the state park and would have a much greater impact.

The basis for our position is as follows:

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 is surrounded by 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 this proposed wind farm development. It has 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 an industrial-scale wind farm in such immediate proximity to our Cardigan facilities and to Cardigan Mountain State Park would likely significantly degrade the quality of the visitor experience. In addition, there is potential for significant cumulative impact to the Cardigan experience from major wind farms either already constructed (Iberdola’s Groton wind farm), or proposed immediately to the south (Wild Meadows wind farm). 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.

The New Hampshire Site Evaluation Committee web site\(^1\) lists “Proposed wind power siting guidelines”. These guidelines are intended to guide appropriate wind power development in the state, describing conditions lesser to serious concern for wide range of natural and social resource values. What follows are relevant 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 this potential industrial-scale wind farm 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 this project would have similar impact on the facilities that AMC operates for the public. Guests come to both AMC’s facilities and Cardigan Mountain State Park in large part because of the high quality scenery. This proposed project represents a serious threat to both AMC and state-owned assets of major significance.

Thank you for your consideration.

Sincerely,

Susan Arnold  
Vice President for Conservation  

Paul Cunha  
Vice President for Outdoor Program Centers