



75 Fairfield Street • St. Albans, VT 05478 • (802) 524-5958 • Fax (802) 527-2948

September 18, 2015

Swanton Wind LLC
c/o Travis Belisle
P.O. Box 385
St. Albans, VT 05481

Re: NRPC Comments - Swanton Wind LLC – 45-Day Pre-filing Notice

Dear Mr. Belisle,

The Northwest Regional Planning Commission (NRPC) Policy/Project Review Committee has reviewed the 45-day pre-filing notice from Swanton Wind LLC for the construction of seven (7) wind turbines producing up to 20 MW of power located off of Rocky Ridge Road in Swanton, Vermont.

After reviewing the application, NRPC's Policy/Project Review Committee has developed an initial list of topics that it feels warrant additional information. The Committee expects that these areas will be addressed in greater detail in your full application to the Public Service Board.

- a. **Wetlands** – The proposed plan shows several areas that where proposed development will directly affect wetlands and wetlands buffers. This includes several proposed turbine locations and the location of the access road. Have the wetland and wetland buffer locations been verified in the field? If yes, are all wetlands identified as Class 2 wetlands? Is it possible to redesign turbine sites and the access road to reduce wetland impacts? How will wetlands be utilized and/or effected as a part of the stormwater management plan for the site?
- b. **Habitat blocks** - The proposed project is located in a habitat block that is highly rated by the Vermont Agency of Natural Resources and the Northwest Regional Plan (see page

- 84). What steps have been taken by Swanton Wind LLC to minimize fragmentation of this habitat block? Has Swanton Wind LLC studied the potential effect of the proposed project upon large mammal species within the habitat block? If yes, what steps will be taken to attempt to mitigate undue adverse effects of the proposed project upon wildlife species within the habitat block?
- c. Deer yards - The proposed project location is located immediately adjacent to an existing deer wintering area. What steps will be taken to minimize undue adverse effects upon that area?
- d. “Flicker” Effect - NRPC has heard from several citizens that are concerned about the “flicker” effect caused by shadows of turbines created by the sun. Will this proposed project create a “flicker” effect?
- e. Noise - What additional information can be provided regarding noise impact in the vicinity of the project? What will decibel levels be at individual points surrounding the proposed project (ex. 500 feet to the south, 1000 feet to the west, ½ mile to the east, etc)? How does topography, seasonal variations in tree canopy, and the presence of water bodies affect the ability of sound to travel?
- f. Stormwater and Water Quality - What will be the capacity of the proposed stormwater facilities on site? How large of a storm will the system be designed to handle? What steps have been taken to ensure adequate future stormwater capacity given forecasts that the region will see increasingly intense storm events due to climate change? Will all of the stormwater be drained to the west side of the “Rocky Ridge?” What water bodies will be directly impacted by the stormwater generated by the proposed project? What impact will this project have upon phosphorus levels traveling into Hungerford Brook and Missisquoi Bay in Lake Champlain in an average year? Will there be a maintenance plan for stormwater facilities on site? If yes, will this plan be agreed upon between the applicant and the State?
- g. Groundwater - Where will stormwater ponds occur in relation to private wells in the vicinity of the proposed project? Given local soils, can you provide evidence that the project will not have an undue adverse effect upon private wells and groundwater quality in the vicinity of the project?

- h. **Economic Impact**– Please provide evidence that the proposed project will not create an undue adverse impact upon local municipalities’ tax base and the capacity of local municipalities to provide municipal services. Has Swanton Wind LLC reached any agreements with local municipalities to provide additional economic or material assistance to mitigate anticipated undue adverse effects on municipal services or for any other reason? How many permanent jobs will be directly created by the proposed project?

- i. **Grid Capacity** - Is there additional capacity for this project on the grid? What cooperation has there been between the local utility, ISO-NE and the applicant regarding grid capacity? Is the applicant committed to installing potential upgrades and modifications to the grid as identified by ISO-NE?

These comments are based on the information currently available; we may have additional comments as the process continues. The Policy/Project Review Committee anticipates that NRPC will become an intervenor in the Certificate of Public Good process. It may benefit all parties to discuss the application in person once the full application has been made to the Public Service Board, yet before the Motion to Intervene is filed.

Please note that the 2015 Regional Plan has several specific policies that pertain to planning for and reviewing proposals for energy generating facilities (see pages 41-42). The Committee asks that you keep these policies in mind as you make your application to the Public Service Board. The policies are:

1. **Aesthetic concerns and scenic character:** Aesthetic and scenic impacts shall be considered, including the character of the proposed site and the degree to which the proposed facility will fit with the existing landscape. Proposed projects shall meet the aesthetic test set forth under Criterion 8 of Act 250.

2. **Natural resource impacts:** Power-generation facilities shall be sited so as not to destroy or have an undue adverse impact on necessary wildlife habitats, ecological systems and water and/or air quality. The review of impacts shall not be limited to the power generators alone, but shall also include other elements of the facility such as access roads, site clearing, on-site power lines, substations, lighting and off-site power lines.

3. **Noise, vibration, glare and other concerns:** Operating noise, vibration, glare and other impacts can be produced by power-generation facilities. Designers shall take reasonable mitigation measures to minimize or eliminate such impacts from having an undue adverse effect on neighboring properties.

4. **Health and safety concerns:** Energy-generation facilities shall take reasonable mitigation measures to minimize or eliminate health and safety concerns resulting from the transport of fuel, waste or other products, and other impacts of generation, such as electric and magnetic fields.
5. **Plans for decommissioning:** Power-generation facilities deemed to be abandoned or unused shall be removed by the owners/operators within a reasonable time from cessation of operations. Restoration or enhancement of the site to its natural state shall be the objective of this effort.

Please feel free to contact me should you have any questions.

Sincerely,



Taylor Newton
Regional Planner

cc: Susan Hudson – Public Service Board, Clerk
Geoffrey Commons – Public Service Department
David Jescavage – Town of Swanton, Town Administrator
Reginald Beliveau – Village of Swanton, Village Manager
Carrie Johnson – Town of St. Albans, Town Manager
Tom Howrigan - Town of Fairfield, Selectboard Chair