



Appalachian Mountain Club

To: Richard Ober, Chairman of the NH Energy Efficiency and Sustainable Energy Board (EESE) and members of the Board
From: Susan Arnold, Director of Conservation, Appalachian Mountain Club
Date: April 9th, 2010

Dear Chairman Ober and Members of the EESE Board:

AMC's mission is to "promote the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Appalachian region." For more than twenty years, AMC has been studying the impacts of air pollution, and more recently of climate change, on high altitude ecosystems in the White Mountains. We know that our society's current dependence on fossil fuels is directly related to the air pollutant and greenhouse gas emissions that impact the enjoyment and safety of hikers and the vitality of New Hampshire's natural resources that AMC works to protect. Transitioning away from a fossil fuel-based economy to address pollution and climate change impacts requires multiple tools, including increased energy efficiency and the development of renewable energy sources.

It is AMC policy to support significant increases in renewable energy that result in actual greenhouse gas and air pollutant reductions, and that are balanced with strong protections for natural and recreational resources of national, regional, or statewide significance. As an organization, we have committed to a carbon footprint reduction goal of 80% by 2050, and to date have made considerable progress towards that goal. We are also collaborating on a project with the White Mountain National Forest to explore mechanisms for reducing the carbon footprint of the millions of visitors who travel to the WMNF each year.

We are concerned, however, that the State of NH and the EESE Board are not adequately addressing the need to balance renewable energy development with natural resource protection. No energy source is without some kind of footprint, and the development of industrial scale wind power on our mountain ridgelines, major hydroelectric projects on our rivers, or unsustainable harvesting of wood biomass from our forests, will have significant long-term impacts on these resources that are not environmentally benign. Such development may also at times conflict with other goals and policies of the State, such as the State Wildlife Action Plan. It is paramount that we balance renewable energy development with protection of our natural resources, especially considering that NH is a major net exporter of the electrical power that it generates.

AMC urges the EESE Board and State of NH to proactively develop specific policies, regulations, and/or legislation that will ensure the protection of natural resources while also encouraging the development of renewable energy sources. The need for such policy has been recognized in the past, as in 2006 the State Energy Policy Commission was directed to address the need for a wind power siting policy in the state. To fulfill that

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directive AMC, along with many other organizations, contributed considerable time and resources to work with the State Energy Policy Commission to collaboratively develop a “*Conceptual Framework for Windpower Siting Guidelines*.” The State Energy Policy Commission then submitted this document to the General Court with the recommendation that the House Science, Technology, and Energy Committee study and determine which concepts should become legislation in the 2009-2010 Session. This Commission also “*urged the legislature to consider the economic (positive and negative) that commercial wind developments would have on local communities, regions of the state, and the state as a whole.*”

To date no further progress towards these policy goals for wind or other renewable energy sources has been made. The State remains in a reactive mode, without its own policy guidelines that could help direct renewable energy development to the most appropriate, least conflicted, locations. Such policies would also help to avoid much of the controversy and dissent that has accompanied certain project proposals. On the one hand, the State is encouraging renewable energy development with public subsidies, renewable energy quota requirements, and the like, but on the other hand it lacks a strategy to ensure that such development will not negatively impact the other important natural resources within the state. To compound the problem, we believe that many of the figures often cited for the potential of renewable energy development in NH fail to incorporate natural resource constraints or potential conflicts with other state resource protection policies and goals. This myopia may result in unrealistic renewable energy production goals, and, most ironically, could potentially sacrifice the very natural resources that we are trying to protect.

AMC strongly encourages the State, with the support of the EESE Board, to continue to promote renewable energy, but at the same time to engage in a parallel and equal effort to enact policies that will balance this development with the protection of our State’s special natural resources. AMC continues to stand ready to offer assistance and technical expertise to this end.

Thank you for your consideration.

Sincerely,

Susan Arnold, Director of Conservation

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