

**The Colebrook Land Conservancy, Inc.
Submission to the Connecticut Siting Council
Respecting Petition Nos. 983 and 984**

March 22, 2011

Executive Summary

The Colebrook Land Conservancy, Inc. (the “Conservancy”) is a local land trust and an important charitable conservation organization in Colebrook, Connecticut, with approximately 300 members. The Conservancy has conserved over 1,050 acres of land in Colebrook. Among the Conservancy’s holdings are several natural preserves, including the Phelps Research Area as well as the oldest upland barn in Colebrook dating from the late eighteenth century. The Conservancy is a science-based organization. The following executive summary of the Conservancy’s report is included for convenience:

1. The six wind turbines are presented by BNE Energy, LLC (“BNE”) as two separate projects. The Conservancy urges the Connecticut Siting Council (the “Council”) to aggregate these wind turbines in determining their environmental effects and consider the cumulative effects of the six wind turbines.

2. The State and Town policies and plans respecting conservation and Ddevelopment do not contemplate or support BNE’s proposed projects. Nor are the wind turbines compliant with the Town’s planning and zoning regulations or wetlands and watercourses regulations. BNE’s assertions to the contrary are false.

3. BNE’s petitions raise significant environmental issues. These need to be approached by the Council on a landscape scale, not on a real estate parcel by real estate parcel scale. Damage resulting from six wind turbines proposed for Colebrook will very likely be consequential not only for the excellent habitat provided by the parcels where the wind turbines are to be located, but also for land a considerable distance away. The proposed sites are near important areas of high conservation value, which have received both State and Federal recognition. These areas are at great risk. BNE’s petition contains no relevant analysis on how these areas will be affected.

4. The exhibits to BNE’s petitions have many short-comings. The studies they purport to report on are “check the box” science designed to permit some clerk to check that an item is included rather than to provide significant scientific information enabling the Council to make an informed decision. There are many examples of their inadequacy, including the timing of site visits and observation work that is patently inadequate to the task of identifying important species, the failure to take soil samples, visual analysis that minimizes what people and wildlife in Colebrook will really see, the failure to consider the likely damaging effects to existing agriculture in the area, the preliminary nature of the bat survey and its methodology, the failures to demonstrate or provide a calculation of statistical relevance, surveys that incorrectly seek to attribute findings from one site to another site, bird field work that is woefully inadequate and accounts for no migratory events or raptors, noise studies that use different techniques for modeling noise in the daytime and noise at night, modeling of noise effects that

is dependent on samples taken on a single day, and no data is provided respecting the cumulative noise effects from six wind turbines.

5. BNE's petitions ignore issues relating to infrasound either as they affect humans or as they affect wildlife. BNE fails to demonstrate lack of effect on wildlife.

6. Colebrook has done its part to host energy generation that does not rely on fossil fuels. Colebrook has three hydro generating facilities. The Conservancy strongly endorses analysis respecting additional hydro facilities, which are non-intermittent, more reliable and more cost effective than wind.

7. The ability of the promoters of BNE, Messrs. Corey and Zupkus, to complete the project they envision without creating significant environmental problems is questionable based on their track record and experience.

Report

The Colebrook Land Conservancy, Inc. (the "Conservancy") appreciates the opportunity to comment to The Connecticut Siting Council (the "Council") with respect to wind turbines proposed for Colebrook, Connecticut by BNE Energy, LLC ("BNE"). Our comments concern both Petitions 983 and 984 inasmuch as we believe the issues respecting each are similar.

The Conservancy is a local land trust and a qualified charity under Section 501(c)(3) of the Internal Revenue Code of the United States. The Conservancy is a non-partisan organization. Our organization was formed in 1986 and is run entirely by volunteers, and we are fortunate to have both an active Board of Trustees and an active membership. The purposes of the Conservancy are to promote, for the benefit of the general public, the preservation of natural resources, including land and water resources, plant and animal life, and unique scenic, natural and historic sites, principally located in, but not limited to, the Town of Colebrook, Connecticut. I invite you to visit our website at Colebrooklandconservancy.org.

The Conservancy has approximately 300 members, a remarkable number given there are only about 1,400 souls in Colebrook. The Conservancy protects over 1,050 acres in Colebrook: it owns 648 acres and holds voluntary conservation easements on 413 acres. Included in the Conservancy's owned property is the Phelps Research Area, which consists of a 395-acre tract that has been described by the The Nature Conservancy as a "prime example of unspoiled nature in the northwestern part of Connecticut." The Phelps Research Area provides excellent refuge for a broad variety of wildlife. About 30 species of animals and more than 20 species of reptiles and amphibians have been reported on or near the preserve. Its location, large size and diverse habitat of rocky slopes, woodlands, post-agricultural fields and wetlands support birds that require undisturbed forest for breeding, such as the broad-winged hawk, pileated woodpecker, yellow bellied sap sucker, hermit thrush, white throated sparrow and several warblers. Besides being an excellent area for bird study and other research, the Phelps Research Area is used to track the long term effects of the 1976 tornado. The Conservancy has provided stewardship of the Phelps Research Area since 1995. In 2009, The Nature Conservancy transferred ownership to the Conservancy, signifying an important vote of

confidence by a national organization. The Phelps Research Area is approximately 2 miles from the location of wind turbines proposed for Colebrook by BNE.

While the Conservancy also owns and holds conservation easements on other significant tracts of land, The Phelps Research Area is a prime example of the benefits associated with the preservation of large tracts of land and the ecological and natural resources of the Northwest Corner of Connecticut. These resources are under ever greater threat, but there are significant conservation organizations in the Northwest Corner working to conserve what is left. And the area has attracted some national attention and Federal and State grants designed to further conservation values and which acknowledge the significance of this part of Connecticut. For example, the Conservancy has been the recipient of various State grants, including one that enabled us to purchase an important parcel at the corner of Routes 183 and 182 (less than 1.5 miles from the site of the proposed wind turbines), which includes excellent bird, wetland and upland habitat as well as the oldest surviving upland dairy barn in Colebrook (originally built in the late eighteenth century and referred to below as "Hale Barn") and a walking trail open to the public. The Conservancy did extensive restoration work necessary to keep the barn upright and historically accurate, and in 2009 was the recipient of a 2009 Barns Grant by the Connecticut Trust for Historic Preservation. Another example is the 50-acre natural preserve on Rockwell Road (Route 182A) on which the Conservancy has also established a walking trail with informative brochures at the trail head.

The Conservancy has also been the recipient of several Federal grants administered through the Natural Resources Conservation Service ("NRCS") in connection with the re-establishment of fields and the elimination of invasive plant species. The Conservancy believes its efforts are an important step in maintaining avian and wildlife friendly habitat in Colebrook. And the Conservancy has sought and received advice from the NRCS in connection with the removal of an older camp and the restoration of a seven acre parcel to a natural state. Once again, this effort should be viewed in the context of a larger, landscape sized effort to provide natural habitat, clean waterways and ecological benefit in Colebrook. The Conservancy is also sponsoring the development of a management plan for parts of Sandy Brook, one of Connecticut's premier trout streams and a State Natural Area Preserve. Sandy Brook is considered the highest ranking salmon restoration stream in the Farmington River basin, home to a diverse number of native fish and threatened or endangered species. We have also constructed various trails and sponsor various educational events during each year. As a result of the Conservancy's initiatives, I can say that we are a science-based organization that prefers to be guided by science in our actions.

By letter dated December 15, 2010, the Conservancy urged the Council to hold public hearings in Colebrook and urged the Council to establish a moratorium pending the establishment of appropriate standards for wind energy projects. The Conservancy appreciates the Council's coming to Colebrook for public hearings. At the time of our letter of December 15, 2010, the Conservancy had not had an opportunity to fully review the petition of BNE with respect to the wind turbines. However, after a careful review of the materials submitted by BNE, it is the view of the Conservancy that it would be an outrageous result if the Council permits the construction of any of the proposed six wind turbines based on the evidence presented by BNE.

1. The six wind turbines are presented by BNE as two separate projects: there are two separate petitions, separate exhibits, etc. In fact, the Conservancy believes a proper consideration demands that these six turbines are really one and the same wind farm. They are close in proximity to one another, and their effects will be as six, not as two groups of three. In evaluating relevant data, BNE has failed to aggregate these turbines; none of the submissions evaluates the cumulative effects of all six turbines, taken together. The Conservancy believes that this is an obvious effort by BNE to minimize issues associated with a larger number of turbines.

Moreover, the Conservancy believes that the Council is required to consider the cumulative effects of all six wind turbines: the Council should consider “[t]he nature of the probable environmental impact of the facility alone and cumulatively with other existing facilities, including a specification of every significant adverse effect...whether alone or cumulatively with other effects, on, and conflict with the policies of the [S]tate concerning, the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish, aquaculture and wildlife.” (C.G.S. Section 16-50p(3)(B).) The failure of the Council to consolidate the proceedings respecting Petition 983 and 984 of course does not preclude such consideration. However, the Conservancy believes such consolidation would have been helpful to the Council at least in respect of its consideration of environmental impacts.

2. The Conservancy would like to call the attention of the Council to the State Conservation and Development Policies Plan (“State C&D Plan”) that is currently in effect and will be in effect until 2013. BNE has sought to shoe-horn these wind turbines into some notion that they are consistent with the State C&D Plan. In fact, these large industrial structures are totally inconsistent with the State C&D Plan. The State C&D Plan provides for two (of six) significant principles insofar as conservation is concerned: “4) conserve and restore the natural environment, cultural and historic resources and traditional rural lands” and “5) protect and insure the integrity of environmental assets critical to the public health and safety.” Based on the materials submitted by BNE in its filings with the Council, the Conservancy believes that these wind turbines are not consistent with these overriding growth management principles.

With respect to growth management principle 4), the State C&D Plan provides, “These natural, scenic, recreational and historic areas of the [S]tate are essential to the quality of life, are important economic assets in Connecticut, and must be maintained and protected from adverse effects [emphasis supplied]. Preserving the heritage is a challenge in such a small, densely populated [S]tate with a limited land and water resource base.” (Page 55.) With respect to growth management principle 5), the State C&D Plan provides, “Conservation of resources implies more than regulating effects on individual resources case by case. It requires that we recognize the finite nature of our natural resources and bend our creativity to ensuring that our activities do not deplete or unduly damage those that sustain us. It also requires that we recognize that the building blocks of natural systems interact in myriad ways, that our understanding of these is often limited, and that choices that affect them must be carefully considered. These principles must be integrated into all of our planning activities.” (Page 79.)

Moreover, the Conservancy takes issue with BNE’s statement that the wind turbines are consistent with the growth management principle dealing with “concentrating development around transportation nodes.” In citing this principle, BNE left out significant language; such

omission distorts the meaning of this principle. The full principal states: “concentrating development around transportation nodes to support the viability of transportation options” [emphasis supplied to language omitted by BNE]. Nowhere in the BNE materials is there a discussion of how these wind turbines will “support the viability of transportation options.”

BNE makes much of the State’s dependence on oil. However, the Council should note that very little oil usage, if any, in Connecticut is devoted to the generation of electricity. On a national basis, about 2% of oil imports go to electricity generation; virtually all oil usage goes to transportation and heating. And, BNE perverts the purposes of the state goal of revitalizing regional centers, which may have something to do with oil usage for transportation, but has little to do with energy generation. BNE provides that its wind turbines will reduce carbon dioxide emissions. However, BNE proffers no support for this claim. Indeed, recent research indicates that because base load generating equipment (either coal or gas fired) is necessary to accommodate the intermittent and unreliable nature of wind, there will be very little if any savings in carbon dioxide emissions. This may be particularly true in Connecticut where wind is more intermittent and less reliable than in some other states. It is certainly true of six wind turbines. While the Conservancy is cognizant of the debate on this issue between the wind and fossil fuel industries, it is interesting to note that in Denmark, which provides 30% of its electricity from wind (and has very high electric costs to rate payers), not a single coal fired power plant has been shuttered as a result of wind energy production.

The Conservancy agrees with BNE that “the [L]ocational [G]uide [M]ap that accompanies the [State C&D] Plan indicates the area of Colebrook [in] which the [wind turbines are to be] located is either a ‘conservation area,’ a ‘preservation area’ or ‘rural lands.’” “Conservation areas “represent resource lands for the production of food, wood, water and mineral, or are important for sustaining native flora and fauna and the landscapes essential to scenic and recreational enjoyment.” Moreover, any use that is “clearly and significantly incompatible with conservation” should “demonstrate the lack of alternate sites, overriding social or economic concerns...” (Pages 63 and 64.)

The State C&D Plan also makes reference to the importance of sustaining Connecticut’s forest lands and of the need to work with municipal and private interests to maintain large, contiguous blocks of forest lands, citing a growing belief that 15,000 acres are the minimum size needed to enable forest systems to survive catastrophic events and “to support sustainable breeding populations of various species of birds and roaming animals.” (Page 69.)

The State C&D Plan is very clear in setting “Conservation Area Policies ([i]n order of priority) [:]

1) Existing Preserved Open Space – Support the permanent protection of public and quasi-public land dedicated for open space purposes.

2) Preservation Areas - Protect significant resource, heritage, recreation, and hazard-prone areas by avoiding structural development, except as directly consistent with the preservation value.

3) Conservation Areas - Plan for the long-term management of lands that contribute to the [S]tate's need for food, water and other resources and environmental quality by ensuring that any changes in use are compatible with the identified conservation value.

4) Rural Lands - Protect the rural character of these areas by avoiding development forms and intensities that exceed on-site carrying capacity for water supply and sewage disposal, except where necessary to resolve localized public health concerns.”

BNE's proposed wind turbines violate each of the first three of these policies. BNE seeks to shoe-horn its wind turbines into the fourth policy by hypothesizing the residential development of the properties in question. However, the Conservancy believes that such hypothetical development would be fraught with planning and zoning and significant wetlands and watercourses issues as well as basic issues respecting demand for housing at such locations and the cost of site preparation, road and driveway construction, septic, and the costs of construction of any homes. In addition, the fact that there is a gun club with shooting range abutting the Wind Colebrook South property has traditionally been an impediment to its sale or development. BNE provides no information on any of these matters.

BNE's petitions also make the incredible statement that these wind projects “will be consistent with all applicable local regulations including the Town of Colebrook's zoning regulations, wetlands regulations and plan of conservation and development.” This assertion is absurd on its face. The Colebrook Zoning Regulations currently in effect do not permit wind turbines of any kind. The wetlands impacts proposed by BNE are not permitted as of right in Colebrook's Wetlands Regulations.

The Conservancy also believes the proposed wind turbines are totally inconsistent with the Town's Plan of Conservation and Development which became effective in 2005 (the “Town C&D Plan”). The Town plan is replete with provisions emphasizing protection of the environment, including forest land, agricultural land and wildlife habitat. The Town C&D Plan also seeks the protection of ridgelines from visually intrusive development. In the view of the Conservancy, BNE's proposed wind turbines violate the goals of the Town C&D Plan. The Council is respectfully requested to act in furtherance of the State C&D Plan as well as the Town C&D Plan. In our view, such plans require the denial of BNE's petitions.

3. The Conservancy believes that the significant environmental issues raised by BNE's petitions need to be approached by the Council on a landscape scale. While it is relevant to find site specific facts, common sense tells us that a wind farm can affect wildlife beyond the acreage on which it is located, either directly through sound and light, or indirectly, for example, by causing the removal of prey animals which will result in predators moving to other areas or being squeezed out, or by creating awkward landing patterns for migratory birds. If people are up in arms about the noise, flicker, subsonic issues, etc., then it should be obvious that animals (for this purpose including mammals other than humans, reptiles, amphibians, fish and birds) will very likely also be affected. In the Northwest Corner of Connecticut, and in Colebrook specifically, the Conservancy, the State, the Metropolitan District Commission (“MDC”) and other organizations have made great efforts to preserve the conservation values at hand. The issues of open space, habitat, species preservation, and truly minimizing environmental effects are lost if only a single parcel is considered. The Conservancy believes that the damage resulting from six wind turbines proposed for Colebrook will very likely be

consequential not only for the excellent habitat provided by the parcels where the wind turbines are to be located, but also for land a considerable distance away. Wildlife knows no property boundaries. The Conservancy's wildlife management efforts on its parcels throughout Colebrook have taught us that even small effects on a single property can have enormous effects on the surrounding area. The petitions by BNE contain no scientific analysis of what the broader ecological and environmental effects might be. They seem to ignore the substantial investments and efforts made by the State in the preservation of open land: to the west of the Wind Colebrook South site is Beckley Bog, designated as a National Natural Landmark, and to the south of the Wind Colebrook North site and east of the Wind Colebrook South site is a portion of the Algonquin State Forest. In addition, to the south of the Wind Colebrook South site is Grant's Swamp, another important wetland area with high conservation values. The Conservancy believes that putting six (with maybe more to come) wind turbines in Colebrook will have substantial adverse environmental effects on the surrounding area.

4. The environmental information presented by BNE is not real science: it is "check the box" science that is designed to enable some clerk to say that some required presentation is there rather than to provide significant scientific information enabling the Council to make an informed decision. In particular, the Conservancy would like to call the Council's attention to several obvious areas of the exhibits to BNE's Petitions, in no particular order:

A. Volume Three to Wind Colebrook South BNE Petition, Exhibit I, "Terrestrial Habitat and Wetland Impact Analysis" and Volume Three to Wind Colebrook North BNE Petition, Exhibit I, "Terrestrial Habitat and Wetland Impact Analysis": With respect to the wetlands delineation reports, Mr. Davison visited the Wind Colebrook South property on January 29 and March 16, 2010 and Mr. Davison visited the Wind Colebrook North property on July 27-29 and August 2, 2010. Mr. Davison concluded that there were no vernal pools on either of these properties. With respect to the Wind Colebrook South property, this conclusion was made at a time when there was, according to Mr. Davison's description of field conditions, 2-6/0-3 inches of snow on the ground. Similarly, with respect to the Wind Colebrook North property, this conclusion was reached at the height of summer at the end of July and early August. It is not surprising the Mr. Davison concluded that there were no vernal pools on the properties, but it is not good science. It would not be expected to see vernal pools which by their nature are intermittent at the height of summer or in the dead of winter or on March 16. Moreover, with respect to the Wind Colebrook South property, Mr. Davison concluded there was no frost in the ground on March 16. This is absurd since in Colebrook the frost typically comes out of the ground at the end of March, the first two weeks of April being "mud season." 2010 was not an exception. There may not have been visible frost, but even a short poke by a stick would have resulted in a different conclusion.

As for soil types, Mr. Davison relied on digitally available soil survey information from the NRCS. But, the NRCS is also clear that "The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident." The Conservancy believes that the Council should require BNE to do soil tests in the areas to be disturbed or affected by disturbance. General mapping, particularly in an area where there has been no construction or prior on-site soil mapping other than aerially, is not enough. The Council is entitled to get a more precise soil map from the petitioner that relies on actual soil testing. And, this is more important in areas with significant slopes, perched water tables,

bleeding hillsides, and fragile ecologies like Colebrook than in the relatively flatter places in Connecticut.

The exhibit states that “the field investigation [respecting fauna was] conducted by VHB biologists in October 2010.” It is interesting to note that nothing is said about who did the field investigation or that person’s qualifications. With respect to the survey of habitat and wildlife species, the use of a New England Wildlife Database has its limitations: for example, it would be shocking to any resident of Colebrook who spends time in the great outdoors that no spotted salamanders are listed in the inventory of amphibians likely to be found on the properties. You certainly wouldn’t see them in January, or on March 16, or for that matter in the height of summer, or on the date of the “field investigation” in October, but yellow spotted salamanders are not uncommon denizens of Colebrook’s natural areas. I know of neighboring properties on which they have been seen and I have seen them myself on my farm (which lies at something over 1250 feet above sea level). Database searches are great tools, but to really get environmentally or ecologically relevant data, the Council should require a thorough, actual, real time survey of animal populations at times that are supportive of doing the work. And, as the letter from Ms. Murray of the DEP, dated September 9, 2010, (included in the Wind Colebrook South materials) plainly states: “[The information on the National Diversity Data Base] is not necessarily the result of comprehensive or site-specific field investigations. Consultation with the Data Base should not [emphasis supplied] be substituted for on-site surveys required for environmental assessments.” In addition to salamander populations mentioned in the exhibit, salamander populations that might be on the properties include, without limitation, the yellow spotted salamander, the Jefferson salamander, the Spring salamander, and the Four-toed salamander. Virtually all salamander populations are in decline in Connecticut; of these, the Spring salamander is a threatened species and the DEP states that the Jefferson salamander is “very sensitive to habitat disturbance” and “requires extensive tracts of forest surrounding [vernal] pools to survive.”

Similarly, there are many other mammal species that have been observed in Colebrook and not far from the proposed sites of the wind turbines that are not on the database list included in the exhibit: for example, bob cats (quite common) and several sightings of cougars (quite rare—while the eastern cougar which once prowled 21 states has been declared extinct by the US Fish and Wildlife Service, DNA evidence of its existence seems to have been found in Ontario, Canada. It is not clear whether the cougar-like animal people have seen is a zoo escape, or a representative of some sub-species, or whether western populations are coming East or represent some cross-breeding (as occurred in the Eastern coyote population); however, there have been too many sightings in the Northwest Corner to simply dismiss its presence without further inquiry). Similarly, various species of snakes have been seen that are not included in the database inventory included in the exhibit, including copper head and worm snake (although the latter is sometimes confused with the northern redbelly snake: having accidentally baled one up last year while I was haying, it seemed to me from the DEP description to be the former rather than the latter). The DEP has also expressed concern about the timber rattlesnake: “...continuous efforts are needed to protect and manage the remaining stronghold populations.” (Connecticut Wildlife, January/February 2011, page 5.) The point of this discussion is not to create a list of additional species that may be on the properties, but to point out the obvious shortcomings of relying on internet-available databases and very limited field work in evaluating the environment and ecology of the proposed wind turbine sites.

The Wind Colebrook North exhibit makes reference to the smooth green snake. The letter of Ms. Victoria of the DEP, dated September 3, 2010, makes clear that “[t]his species is dormant from November 1 to April 1.” Leaving aside whether these dates are particular to Colebrook which because of its elevation is colder than other parts of Connecticut, or which in some years suffers greater snow-pack than in others, it would not be surprising to find this snake on the Wind Colebrook North property and the Wind Colebrook South property as well. But no one will know if the very limited field investigation set forth in the exhibit is the basis for the information on this species.

Moreover, as anyone who spends time outdoors in Colebrook also knows, wildlife species experience changes that are either cyclical or may be caused by exogenous factors of one kind or another. For example, in the almost 17 years that I have lived in Colebrook, the coyote population appears to have grown, ebbed and grown again. In three of those years, I have been informed of moose sightings. It is, therefore, very unlikely that on the basis of the October site visit even a qualified investigator can come away with a really significant view of the wildlife resources—or threats to wildlife—in Colebrook. The same growth or ebbing may very well be true of other species, bats with white nose syndrome come to mind although there appears to be no recovery of bat populations to date. However, the paltry science in BNE’s exhibits would not let anyone come to any meaningful conclusions about the effects of the wind turbines on the growth or ebbing of certain species populations.

In the Wind Colebrook North exhibit, the only turtle referred to is the snapping turtle. While these clearly exist, those of us who live in Colebrook would take issue with the notion that other turtles don’t exist at elevations over 900 feet above sea level. A drive past some of Colebrook’s ponds in the summer will yield quite a trove of basking turtles, perhaps painted turtles or a hybrid, none of which is mentioned in the exhibit. There have been reported sightings of wood turtles, which are a species of special concern in Connecticut and require, according to the DEP, “extensive landscape scale habitat.” Of course, because there are few of these (low egg counts, 10 years to reach maturity), one might very well not see any without extensive field work. In addition, although the Conservancy has no relevant information on bog turtles in Colebrook, the sites should be assessed for any impact on the bog turtle, a Connecticut endangered species. The US Fish and Wildlife Service recommends a protocol of studies to assess habitat favored by bog turtles. The Council should require that this protocol be followed in any environmental assessment of the wind turbine sites in the Northwest Corner of Connecticut.

In addition, as those familiar with some of Colebrook’s wetlands and swampy areas recognize, there are quite a few rather rare plant species in these areas. They won’t be found on a cold day in January or even on March 16 and perhaps not in October, and may require more than skirting a wetland to see them. So before any permit for work is given involving or affecting these wetland areas on the properties in question, BNE should be required to undertake a thorough census of such plant species. Again, this has not been done. To state on the basis of an internet search and very little field work that there are no threatened or endangered species defies common sense. None were found: that is likely true. But it is equally likely that given the methodology of the surveys, none would be found in any event. The protocols followed in timing the field work seem almost certain to result in preordained conclusions. However, any impact analysis must be based on the facts. It is the Conservancy’s

contention that the facts have not been ascertained because of the very limited work done and the timing of site visits. Without the facts, the impact analysis is not meaningful.

With respect to Great St. Johnswort, of which a known plant population exists east of the Wind Colebrook South site, and which is a plant of State special concern, it should be obvious that such a plant will not be identifiable either in January or on March 16 when the site visit was made by Mr. Davison, or in October. It would be identifiable in late July or early August, however. Similarly, Beckley Bog, like some other wetlands in Colebrook, contains pitcher plants, among other things. These are rather rare and it would not be surprising if they also existed in the wetlands of the Wind Colebrook South site. But no one will know that based on site visits set forth in the exhibit. (See Norfolk Conservation Commission, [Inventory of Natural Resources](http://www.norfolkct.org/town_docs/cc/NRI_7.24.09_lowres.pdf) for additional data respecting Beckley Pond and Beckley Bog at www.norfolkct.org/town_docs/cc/NRI_7.24.09_lowres.pdf.)

Given even modest familiarity with the Wind Colebrook North site, it is hard to imagine a more dramatic disruption of wetlands than the proposed access road to the northern-most proposed wind turbines. Certainly the exhibit does not give any sense of what this access road would look like—simply pasting the words “access road” onto a vegetation-rich aerial photo does no justice to how much damage will be wrought by this proposed access road. Again, the lack of actual soil tests and reliance on generalized soil data does not give a very good impression of what the site is actually like, particularly in the spring. Going there in late July and August when even the wetter places in Colebrook are somewhat dry can leave an observer with an incorrect impression.

In the summary of these exhibits, it is stated that “The proposed Project may actually help local wildlife populations by preserving open space and protecting existing habitat from suburban development.” This is an utter canard: no one has proposed suburban development, nor has anyone apparently investigated either the feasibility of suburban development or whether it is possible under Colebrook’s planning, zoning or wetlands regulations. In any event, the issue is not to compare the damage to the ecology and environment to some speculative development or what might be (we could posit a nuclear waste dump, for example, which this wind farm might be an improvement upon), but rather to compare the proposed damage to what currently exists and the context of the land as part of open space that gives the Northwest Corner of Connecticut and Colebrook in particular their character. This wind farm would irretrievably change the character of the Town. What is clear is that the properties on which the wind turbines are proposed contribute, in the words of Mr. Davison, “moderate to high value wildlife habitat.” The Council should protect those conservation resources.

B. . [Volume Three to Wind Colebrook South BNE Petition, Exhibit J, “Visual Resource Evaluation Report”](#) and [Volume Three to Wind Colebrook North BNE Petition, Exhibit J, “Visual Resource Evaluation Report”](#): These studies contain conclusions that seem intended to minimize the intrusive visual effects. While the acreage statistics of affected areas are interesting, many people in Colebrook believe that a better measure would be the number of homes that will have visual intrusion from these wind turbines. The exhibits provide that Route 44, Rock Hall Road, Flagg Hill Road, Stillman Hill Road (Route 183), Greenwoods Turnpike, Pinney Street and roads in Norfolk and Winchester will be affected by views of the wind turbines (although none of the pictures in the materials contains any residential structure which we believe was not merely fortuitous). However, among the Colebrook roads that will

also be affected, in addition to those mentioned in the Wind Colebrook North and Wind Colebrook South exhibits, will be Phelps Road, Pine Road, Bunnell Street, Bunnell Street Extension, Rockwell Road where the Conservancy owns a 50-acre natural preserve with a walking trail available to the public, Route 183 (including portions of a State designated Scenic Road) at or near the Conservancy's restored Hale Barn and approximately 40 acres of land with a walking trail, Old Colebrook Road, Wheeler Road, Church Hill Road, Chapin Road, and even the central areas of Colebrook Center on Schoolhouse Road and on the eastern side of Colebrook on Eno Hill Road. The point in listing the various affected roads is to call the Council's attention to the obvious and ubiquitous visual effects these turbines will have on all but less than a handful of residential roads in rural Colebrook. There will be virtually no escape for anyone in Colebrook. While the Conservancy has not done a study of the visual affects, we estimate, based on the information provided by the exhibits, that within the five mile radius the vast majority of the residences in Colebrook will be affected in some way, either directly or on the State and Town roads giving access to the residences.

In addition, the Conservancy would like to call the Council's attention to the fact that within a mile and quarter of the proposed wind turbines there are not less than four farms (whose owners' principal occupation is farming) that will be visually affected. Three of these have horses, among other livestock, and there are an additional half dozen or so homes with one or more horses in backyard barns. As an owner of one of those farms who happens to have horses, I can tell you that it is not at all unlikely that as flight animals, the horses will suffer from the visual intrusiveness of the wind turbines, including without limitation "flicker" and the rotation of blades, not to mention any noise consequences. They are in paddocks or open fields precisely predicted by the surveys to be the most affected areas. Horses tend to react to anything strange by running about two hundred yards at full tilt, then turning around to look at what bothered them. They also can spook at intrusive stimuli, as anyone who has ridden knows, which may pose a danger not only to horse, but also to rider. The Council should reckon with the fact that if this wind farm is built, there will likely be a loss of some, perhaps all, of these farms, which comprise the majority of remaining farms in Colebrook. Given the State's efforts to retain its farmland, the significance of which can be judged by the amount of money the State has invested into this problem, this kind of a loss in Colebrook would be a very adverse consequence indeed, particularly because it is likely to be repeated in other parts of the State if BNE's siting paradigm is followed.

Residents and visitors to Colebrook, Norfolk and Winchester have been attracted to outdoor activities, whether in Algonquin State Forest (the highest altitudes of which lie northeast of the proposed sites), on Conservancy land or trails maintained by the Conservancy, in Beckley Bog National Natural Landmark, at Haystack Mountain, at Dennis Hill State Park and at countless other area locations, because of the possibility of virtually unencumbered interaction with nature and the freedom from the visual intrusion of industrial equipment, not to mention the blessed silence that is lacking elsewhere. These proposed wind turbines would forever change that, and if permitted without adequate standards to preserve conservation values, likely will change the character of the Northwest Corner of Connecticut that is so attractive to the residents here and brings important tourism dollars and tax revenues into this State.

C. Volume Three to Wind Colebrook South and Wind Colebrook North BNE Petitions, Exhibit K, "Bat Acoustic Studies for the Colebrook Wind Resource Area": The exhibits for the Wind Colebrook South and Wind Colebrook North petitions are the same. The exhibit claims

that “[d]ue to similarities of habitat, landuse [sic] and landcover [sic], results of acoustic bat surveys for Colebrook South are likely indicative of species composition and relative abundance for Colebrook North.” The Conservancy takes issue with this statement. For example, there is a wide open, golf driving range on the Wind Colebrook North property; a greater portion of the property is wetlands; the topography of the property dips into the Millbrook area which is a significantly different watercourse than is found on the Wind Colebrook South property where the acoustic studies were done. Moreover, there are altitude differences in the proposed placement of the wind turbines which may be significant. The Conservancy believes that the Council should insist on proper studies for both properties. Indeed, the exhibit states that “substantial differences in bat detection rates between stations were apparent...” If not caused by faulty equipment, this alone seems to suggest, and the Conservancy believes, that bat populations are not necessarily uniform across the landscape.

The exhibit’s executive summary is revealing about what was included and what was not. The Conservancy believes it would be proper to do bat studies not only during the “maternity season,” but also during periods of expected seasonal migration. The exhibit omitted any information during periods of seasonal migration.

The exhibit purports to be only a preliminary survey. For example, there needs to be an “investigation of detector functionality...prior to the completion of a final report.” Absent some explanation, the fact that detectors were changed in mid-study merits investigation. The exhibit gives averages for “[f]atality estimates from post-construction monitoring at wind energy facilities in eastern North America”. It is not clear that the samples on which these averages are based have any statistical validity or that they have been peer-reviewed or are not biased. It is interesting to note that nothing is said about who did the work on the study that is the subject of this exhibit or that person’s qualifications. Moreover, the Conservancy notes that some research suggests that it is difficult to generalize from one wind facility to another without doing adequate field work.

The Conservancy believes that bats are an important environmental issue in Connecticut, particularly because white nose syndrome has had very material adverse effects on bat populations. The Conservancy has sponsored educational programs on bats and has encouraged residents to put up bat houses. However, as the DEP can verify, white nose syndrome is decimating bat populations in New England. The exhibit indicates that the area surveyed is subject to considerable bat use. The Conservancy believes it is likely that the level of bat activity in the habitats at issue will be significantly higher if and when bat populations generally recover. It would be foolish not to expect wind turbine bat mortality to also increase in such case.

Moreover, the Conservancy believes that some of the methodology of the study could have been improved in order to yield better, more accurate results. For example, the Anabat detectors were placed two meters above ground level in Wind Colebrook South. The Conservancy believes that such placement does not capture accurately the likely bat interaction with wind turbines that are almost 500 feet tall. A better placement for some detectors might have been at different levels on the meteorological tower that was already in place on the Wind Colebrook South property. In addition, more Anabat detectors (that according to the exhibit have “...an effective range [of] less than 30 meters”) would have been appropriate.

After all, BNE seeks permission to put blades on their turbines which have diameters of 100 meters.

The exhibit acknowledges that the methodology used has "...limited use in identifying the bat species that produced the recorded call." The Conservancy believes the Council should require additional work in order to establish what species of bat are at issue in both the Wind Colebrook South and the Wind Colebrook North properties. An internet search of likely candidates is not a reliable substitution for real science. Indeed, the methodology used resulted in "call files that were too fragmented for proper [bat species] identification". The Conservancy notes that nowhere in the exhibit is there a discussion of the statistical validity of this study, or the effects of the many variables mentioned in the exhibit on the statistical validity of the study. The Council should insist on a demonstration of the statistical validity of a study such as this, even if it is a "preliminary" one.

The exhibit makes no reference to what might be expected as clear cuts made to accommodate the proposed wind turbines cause bat populations to seek out these areas in foraging, with consequent effect on mortality rates. This study is mute on this subject. If bats are drawn from neighboring environments to one that may seem more hospitable to them but is in reality more likely to cause increased mortality, the wind farm could hasten further declines in bat populations.

As stated in the exhibit, "...although installed wind-energy capacity has increased rapidly in recent years, the availability of results from well designed studies from these projects has lagged." The Conservancy believes the study that is the subject of the exhibit was an inexpensive effort to comply with the Council's need for information, but really is inadequate to that task.

While the statistical value of the study is questionable, the exhibit concludes that fatality rates "may be moderate." The Conservancy believes that because of the decimating effects of white nose syndrome, the Council should find even low fatality rates unacceptable until bat populations increase. Moderate fatality rates clearly are unacceptable.

D. Volume Three to Wind Colebrook South and Wind Colebrook North BNE Petitions, Exhibit L, "Breeding Bird Surveys for the Colebrook Wind Resource Area": The exhibits for the Wind Colebrook South and Wind Colebrook North petitions are the same. The exhibit claims, in similar language used in the bat acoustic exhibit, that "[d]ue to similarities of habitat, landuse [sic] and landcover [sic], results of field surveys for Colebrook South are likely indicative of breeding bird species composition and relative abundance for Colebrook North." The Conservancy takes issue with this statement for the same reasons stated in the discussion of the bat acoustic exhibit. While there are similarities in habitat types, there are also significant differences. The Conservancy also notes that no information was given respecting the qualifications or background of those doing the field work for this exhibit.

The Conservancy believes that each wind farm site in the United States is different insofar as the effect on birds is concerned and that it is a mistake to draw generalized conclusions. Moreover, the Conservancy believes that any methodology for bird study that is limited to an internet search and 16 days of field work (June 29 through July 15) is bogus science. To really have an understanding of birds in any area requires a study time of not less than three years.

For example, in the more than 16 years that I have lived in Colebrook, we have had three migration events where literally thousands of birds landed for a short time in the forest and ecotones surrounding our fields. You won't see those events every year, and you certainly won't see them between June 29 and July 15. When they do happen, they are amazing. Only a longer term study can help understand migration patterns at a very local level. BNE has presented no such study.

Moreover, the Conservancy would like to call the attention of the Council to other features in the methodology of this study. In particular, 12 breeding bird use points (each 50 meters in size) were observed, each for five minutes. There were three visits to each such point. Each point was observed over the course of three days (June 29, July 6, and July 15) for a total of 15 minutes in aggregate. The Conservancy believes that such observation time is wholly inadequate. The property (Wind Colebrook South) is an uninhabited natural area. Common sense might say that the intrusion of man, the apex predator of this earth, might very well affect the behavior of birds in the area. It might take more than five minutes for normal behavior to resume. And each of the three visits would likely cause considerable concern amongst the breeding birds.

On the basis of its knowledge of the Phelps Research Area, the Conservancy believes the list of birds in the exhibit would be augmented by further field work. In addition, the Conservancy notes that no raptors were noted. On my farm less than 1.5 miles away from the wind farm, and in my haying activities during the summers, I have seen red-tailed hawks, goshawks, sharp-shinned hawks, cooper's hawks, various owls that I could not identify specifically, on one occasion a juvenile eagle, turkey vultures, and common ravens. Of these, sharp-shinned hawks are an endangered species, and until relatively recently, common ravens were a species of special concern (the exhibit did note one sighting of a common raven). In addition, although an owl was also seen, it was not identified. Absent further field work no one will know if it was a northern saw-whet owl (a species of special concern that the Council may be familiar with inasmuch as a nesting area was found in Hartland in connection with a proposed cell tower location) or perhaps, though less likely, even a long-eared owl (an endangered species). Individuals on properties neighboring Wind Colebrook South and North have seen a similar list of raptors noted above. These raptors will be at risk in the presence of wind turbines. The Conservancy believes it is likely that raptors also use the properties proposed for the wind turbines and that three five minute visits to selected observation points are too few and too small a survey sample to adequately assess any property.

It is also worth noting that in a wetland not more than two miles away an American bittern was seen a few years ago. Similarly, whip-poor-wills (a species of special concern) are nocturnal and, as the DEP has noted, "...standard survey and monitoring techniques do not work well." ([Connecticut Wildlife](#), February 2009.) The point of this discussion is not to enumerate all of the species that are likely to be seen at the property, but rather to underline the fact that the studies supporting the exhibit are woefully inadequate.

The Conservancy would also like to bring to the attention of the Council the warbler population documented in the exhibit. While the Conservancy believes that further field work may well establish more or other warblers in the area, it is important to note that warbler populations in Connecticut have been under some strain as development has encroached on habitat. In addition, though not mentioned, but likely to be present in portions of the property

that are early succession forest, are woodcock and ruffed grouse, which also have been of some concern in Connecticut. The drumming of ruffed grouse is a welcome seasonal sound in Colebrook where early succession forest habitat is available. The Conservancy has made efforts to protect and create early succession forest environments that are bird and wildlife friendly. The Conservancy believes that the exhibit does not demonstrate that wind turbine development will not adversely affect species like warblers, woodcock and ruffed grouse.

The Conservancy also believes that the Council should require the petitioner to study the affected areas during migratory events. For example, it seems likely that Canada geese (of which one was noted—in the Conservancy’s experience, where there is one, there are likely two or more) will use open water portions of the wetlands during migration season. It may well be that siting of the wind turbines will interfere with the landing patterns established by these or other migrating birds. But no one will know that if the field work isn’t done. For example, on my farm, Canada geese arrive during migration season. They invariably have the same take-off and landing path they had the prior year as they seek either water or open field. An evaluation of migratory events may well assist in avoiding siting that interferes with these migratory and landing patterns. Altamont, California comes to mind as a place where inadequate science and field work seem to have caused severe bird kills and associated environmental problems.

Finally, the exhibit is silent about the effects clearing areas around the wind turbines will have on birds. It may make the area more hospitable to raptors seeking prey in open areas, or to Canada geese seeking resting or even nesting areas, etc., and may therefore cause more harm to birds than if left in its natural state. The exhibit does state that it can be anticipated that “significant reduction in abundance” could occur at distances up to 400 meters—i.e., on other people’s property—but cites no authority for this contention. Only further field work respecting these sites can quantify the likely losses, and indeed, if losses will occur at greater distances. Certainly no conclusions can really be drawn from the little work done to date and, therefore, the bald statements of little effect cannot be taken at face value.

E. Volume Three to Wind Colebrook South BNE Petition, Exhibit M, “Noise Evaluation” and Volume Three to Wind Colebrook North BNE Petition, Exhibit M, “Noise Evaluation”: The Conservancy believes that these exhibits also have serious flaws. For example, the exhibits state, “The noise analysis assumed that the proposed wind turbines would be operating at the maximum wind speed during the daytime period and at the mean wind speed for the nighttime period.” Why the difference between day and night? And what mean was used: the mean of periods of operation with sufficient wind, was the mean determined with wind levels that are too great for operation, or is it the mean of the entire year? Insofar as a determination of environmental effect is concerned, noise levels should be tested in the same way for day and night. It seems obvious that to use the mean at night (when wind tends to be stronger in any event) may give a very false impression of the acoustic properties of these wind turbines. And sound on some nights may be considerably greater than on others. It is not at all clear that at all times of the year maximum noise at night will be at a lesser wind speed than during the day. In fact, because noise is subjective for wildlife as well as for people, it is likely that perceived noise at night will seem at a higher level than daytime noise. The Conservancy believes nocturnal noise will likely adversely affect wildlife.

Moreover, the formula proffered by the exhibit includes no variation for different anchoring, as for example, in soils, glacial till or on ledge, or what the likely effects might be with respect to noise resulting in the installation of these wind turbines; for example, if blasting or drilling into rock were necessary. There is some evidence in the literature that such differences in anchoring can account for different acoustical effects, as can terrain differences (with hilly terrains tending to be noisier). It is not clear whether the modeling adequately included the effects of terrain on sound. It certainly does not appear that the modeling included the effects of wind direction. In addition, the tests were performed only on April 1, 2010, according to the exhibit. It may well be that different results would occur if the tests were performed on a clear day in January, for example. Connecticut's noise requirements are not limited to some single time period. The point is that noise must be compliant at all times.

Nowhere in either exhibit is there a composite modeling of the noise effects of both sites. The Council should require such data on a cumulative basis for the six turbine wind farm as a whole. In addition, the siting proposed for these wind turbines, may result in times when the noise is exacerbated by the effect of turbulence from one or more wind turbines on other turbines. The exhibit contains no relevant information on this issue.

There appears to be evidence that wind turbine noise can adversely affect farm animals. As noted above, there are several farms with livestock, including horses, cows, goats, pigs, chickens, etc. within a 1.25 mile radius of the proposed wind turbine sites. The Conservancy believes that the Council should require further study as to the effects of the demonstrable noise of these wind turbines on livestock. Again, with respect to horses, I can speak from experience that they will almost certainly become agitated and their flight instincts will set in at these noise stimuli, particularly if the noise is intermittent. Not all horses react to noise equally. But it is fair to say that it is likely that such noise will cause not insignificant agitation in horses.

Finally insofar as noise is concerned, the Conservancy believes that even if the wind turbines were not to run afoul of the DEP noise standards which were developed without consideration for siting wind farms, it is very likely that certain wildlife will be driven away. As a result, there could be cascading effect as prey leaves the area which will certainly result in some predators leaving the area. None of the exhibits address this issue, which is really one of the principal issues surrounding any wind turbine siting plan. The assumption of the petitioner seems to be that noise within the DEP standards affects no one or no wildlife. This is patently untrue.

5. The Conservancy also asks that the Council address infrasound issues. In that connection, the Conservancy believes Epsilon Associates, Inc. ("Epsilon") which we understand has been engaged by the Council to advise it, may have a bias in favor of the wind industry for which Epsilon has done considerable work. For example, in the area of infrasound, The Conservancy found a report on the internet authored by Epsilon (July 2009) claiming there were no infrasound health consequences from wind turbines. None of the authors of the report were trained in medicine. The Conservancy has no expertise in issues relating to infrasound-caused medical issues in humans; however, there is a considerable body of research suggesting that many other animals are affected by and respond to infrasound, and some even use it to communicate. The amount of academic research in this area is too great to ignore and casts a very long shadow of doubt on Epsilon's conclusions. Amphibians, reptiles, fish, arthropods and

rodents create and sense infrasound. Insects and earthworms are also thought to sense infrasound. Snakes are known to sense infrasound.

In fairness to Epsilon, the Conservancy recognizes that the 2009 report seemed based on a search of the literature. The Conservancy would like to remind the Council, however, that a literature search at the time of Galileo would have concluded that the sun revolves around planet earth; this would have been incorrect.

The Conservancy believes that insofar as wildlife is concerned, the emissions of infrasound by wind turbines have great potential for harm. BNE has submitted no work addressing the affects of infrasound on species likely to be found on the properties in question or, for that matter, on properties to which infrasound will carry. The Conservancy believes that noise and infrasound may cause certain species to leave the area or otherwise adversely affect them. For example, the Conservancy is concerned that there may be effects on the smooth green snake if this species responds negatively to the infrasound emitted by the proposed wind turbines. In addition, amphibians like spotted salamander and frogs may be affected. The Conservancy is not in a position to offer any relevant data about expected effects. But we do think the questions need to be asked and answered with appropriate scientific studies before wind turbines are sited in the area under consideration.

In addition, the Conservancy would like to call the Council's attention to Beckley Bog, which abuts the Wind Colebrook South property to the west. Beckley Bog is a sphagnum-heath-black spruce bog, the southernmost peat bog in New England. In May, 1977, it was declared a National Natural Landmark. The peat in Beckley Bog is reportedly 51 feet thick. It undoubtedly provides rather unique habitat in this part of Connecticut and all of us should be careful to preserve it. Beckley Bog will be within range of infrasound and audible noise from both Wind Colebrook South and Wind Colebrook North. BNE has provided no information about what these particular effects might be on this National Natural Landmark. Again, the Conservancy urges the Council to require appropriate scientific studies before wind turbines are sited in the area under consideration.

6. Many people in Colebrook believe that Colebrook has already contributed to the renewable energy portfolio in Connecticut at great cost to the Town. The Town was torn apart when Colebrook River was flooded in the 1940's to make way for the MDC's Goodwin Dam and Colebrook River Dam, and the memory of those forced to move still reverberates within the Town. According to the MDC website, "The Goodwin Facility generates 13,600,000 kilowatt hours of electricity in a typical year, enough to serve 2,000 homes. The Colebrook River Facility generates enough electricity to serve 1,000 homes—approximately 6,700,000 kilowatt hours annually." In addition, there is a third hydro-generation facility in Colebrook.

The Conservancy strongly endorses further analysis of hydro possibilities in Colebrook which may be both cheaper, more reliable and non-intermittent before going to an intermittent, unreliable, high cost (particularly when State and Federal subsidies are included, not to mention the need for back-up gas generating equipment and transmission lines), less efficient renewable energy portfolio which will have grave consequences for Colebrook, Norfolk and Winchester and for the Northwest Corner of Connecticut generally. At a time when natural gas prices look to continue to be very low, something that no one would have considered when the renewable portfolio standards were introduced in 2005, it would be valuable to consider

whether the wind component is in fact unnecessary or should be curtailed in an effort to keep electric rates in check. These types of analyses are already being done by countries like Denmark and Germany where resistance to ever increasing electricity costs by consumers has resulted in decommissioning of some wind turbines. The Conservancy believes the Council should consider other more advantageous, less intrusive generating capacity if it is determined that Connecticut requires additional electricity generation.

7. Finally, the Conservancy is concerned about the ability of the promoters of BNE, Messrs. Corey and Zupkus, to complete the project they envision without creating significant environmental problems. Neither Messrs. Corey or Zupkus, so far as is known to us, has any operational construction or construction supervision experience. They have no track record with bringing any project to completion. While the Conservancy expresses no view on Mr. Corey's generous gift of a hot tub to former Gov. John Rowland, the Conservancy does take note of the failure by Messrs. Corey and Zupkus to prevent the illegal clear cutting of 2.3 acres on State Forest land in North Canaan. The Conservancy is at a loss to explain the promoters' failure to use a simple GPS device and a map in determining whether the site was on State land or not. The Conservancy believes the failure to do so was at best a careless error and may be indicative of taking untoward short cuts in achieving their goals. The cavalier statements of compliance with regulations and conservation and development plans, as well as the submission of the exhibits discussed above, create additional concern. Moreover, the promoters have already failed to pay their real property taxes to the Town of Colebrook on time. The Conservancy believes there is significant risk that environmental matters respecting the wind turbines will be similarly ignored.

8. In conclusion, all of these exhibits raise many more issues than they answer. The Conservancy believes that the Council has no choice other than to deny Petitions 983 and 984 unless and until additional, appropriate, well designed studies are undertaken. The current spate of exhibits represent the prostitution of science to the desires of promoters. They are "check the box" science and risk significant damage not only to the environment, but also to the State of Connecticut and the entire Town of Colebrook.

Respectfully submitted,

The Colebrook Land Conservancy, Inc.

By: _____
Manuel Cords
President