From: Greg Perkins
To: Todd, Fred
Subject: Bowers Wind Project DP # 4889
Date: Monday, March 12, 2012 1:17:50 PM

Dear Mr. Todd -

Please find below my response to Champlain Wind LLC's answer to LURC's 15th Procedural Order.

Greg Perkins

March 12, 2012

Frederick W. Todd, Project Planner

Land Use Regulation Commission

22 State House Station

Augusta, Maine 04333

RE: Bowers Wind Project DP#4889

Dear Mr. Todd:

I am very concerned that First Wind (Champlain Wind, LLC) is playing games with the Land Use Regulation Commission and the citizens of the state of Maine.

I realize that the Expedited Wind Power Law was written to assist wind developers in an effort to get applications reviewed, but Champlain Wind, by ignoring its March 9, 2012 deadline to submit a written description of its plans for reconfiguring the Bowers Wind Project, has, again, affronted LURC and Maine taxpayers. Champlain seems to wish to be able to turn the spigot of regulatory controls off and on at its will.

The Land Use Regulation Commission has bent over backwards for Champlain Wind. It has stated, **"By Friday, March 9, 2012, the Applicant must submit, to the Commission and the other parties, a written description of its plans for reconfiguring the Bowers Wind Project to address the concerns expressed by the Commission during this proceeding and at the Commission's deliberations on the visual impacts of this Project in September and October of 2011."** This is a very clear request.

Champlain appears to want the US and Maine taxpayers and LURC to assume many of the

risks of permitting this development. It says that one of the reasons that it can't comply with LURC's request is a lack of a resolution on the Emera issue – in effect, admitting that First Wind isn't financially solvent enough to proceed with the Bowers project.

I work for a small college as a learning specialist and have also worked in public schools as an educator. I feel that I must offer my observations relative to past students I have known (and their comments about late work) and compare them to Champlain Wind LLC's response to LURC's 15th Procedural Order.

First, Champlain Wind seems to want LURC to design the project for them, not unlike some students who lack the skills or motivation to complete their assignments.

Secondly, Champlain implies in their response that they have perhaps been bullied by LURC (possibly on the playground) because LURC has not interpreted for them the study group's findings (options for assessing cumulative visual impacts). In other words, LURC has not provided to them the **answers to the exam questions**. So the student failed the take home exam, was told that she could re-take it and even had that deadline extended for completion. And now she, once more, has failed to complete or pass the exam in.

Champlain Wind states in their March 9th response that "they have proceeded in good faith……and have made substantial progress in developing options…. but the continued interpretations of regulatory standards ……make it impossible to present a specific project at this time." In other words, the research paper is going to be passed in late, but Champlain, again, expects no penalties. They have a really good start on the paper but don't quite understand the details of the assignment, and, apparently, not much of a creative vision for how this project should be re-designed.

Lastly, Champlain then requests that the commissioners allow them to withdraw the pending application – translate - be exempt from submitting any assignment, although other students have not been exempt.

I think that Champlain Wind has failed the exam, the research paper, and now the entire class.

The only fair option is for the LURC Commissioners to formally deny Champlain Wind LLC's (First Wind's) withdrawal request at their April 6th meeting; and at their May 4th meeting, the Commissioners should **deny the Bowers permit**.

To do anything else tells the citizens of the state of Maine that compliance of the rules and policies established by our state government concerning the protection of our most pristine landscapes are optional. It also sets an unsustainable precedent for LURC's authority concerning all future developments.

Yours truly,

Greg Perkins

Holden, Maine