



**Environmental Compliance Alliance**  
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**Environmental Compliance Alliance**  
Richard H. Bolton, President

July 28, 2007

Mr. Perrin A. Todd, President  
Mountain Landowners Association

Subject: "Assessment of the Sound Level Study for the Mars Hill Wind Farm" Report

Dear Mr. Todd,

Per your request, I've examined the UPC Wind Management LLC noise report of June 21, 2007 as prepared by Resource Systems Engineering (RSE) and submitted to the Maine DEP. The results of my review are enclosed.

Below is a brief summary of my findings:

- 1) RSE does not adequately address the environmental noise factors present in rural, mountainous, cold-climate conditions. Their earlier background measurements prior to construction had serious instrument operation errors.
- 2) The computer model employed by RSE, Cadna/A, is inadequate for predicting noise propagation under many conditions, particularly when the source of the noise is elevated well above the ground.
- 3) The absence of wind speed data at measurement sites precludes assessment of the resident's most frequent complaints – low winds at residences while the turbines are operating.

It is my understanding that you've been notified by the State that the DEP will be undertaking a peer-reviewed evaluation of particular elements of the RSE study. I believe my comments will prove useful in informing such review.

If I can be of any further assistance in this matter please let me know.

Sincerely,

Richard H. Bolton  
Encl.