

**State of Vermont Public Service Board**

**Motion to Intervene Form**

Intervenor and Case Information	
<b>Case Number</b>	8816
<b>Name</b>	Mary Hunter
<b>Mailing Address</b>	Street and # 87 Lebel Dr.  Town St. Albans  State and Zip VT 05478
<b>Daytime Phone</b>	(802) 524-3008
<b>E-mail Address</b>	cdhunter2@aol.com
<b>Name of Legal Counsel (if any)</b>	
<b>Mailing Address of Legal Counsel (if any)</b>	Street and #  Town  State and Zip
<b>E-mail Address of Legal Counsel (if any)</b>	
The Rule 2.209 Criteria	
<b>Intervention as of Right</b> (this is uncommon, leave blank if not applicable to your situation)	
<b>Please identify any statute, legal rule, or Board order that you think gives you a legal right to be a party in the case. If this right is conditional, please describe how you satisfy these conditions.</b>	
<b>Permissive Intervention</b>	See Attached for details
<b>Please describe all the interests you have that you think will be adversely affected by the outcome of the case. Please be as specific as possible. Attach additional sheets if necessary.</b>	30 V.S.A. § 248(b)(1) orderly development of the region; § 248(b)(4) economic benefit to the State and its residents; § 248(b)(5) public health and safety; 10 V.S.A. §§ 6086(a)(1)(A), (B), and (C), (3), and (4) water pollution, conservation, and burden on water supply, § 248(b)(5) and § 6086(a)(8) scenic or natural beauty and aesthetics; § 6086(a)(8)(A) necessary wildlife habitat or endangered species; § 6086(a)(5) transportation.

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Please state whether there are other ways to protect your interest(s) besides as a party participating in this proceeding. If there is no other way for you to protect your interests, please state this fact. Please also explain whether there is already a party in the case who has the same or similar interest(s) to be protected in the case.

There is no other way for me to protect my interests.

**Certification** This section may be completed by the intervenor or a duly authorized representative.

I certify that the information provided on this form is true and accurate to the best of my knowledge.

Print Name       Mary Hunter      

*Mary A. Hunter*

Signature \_\_\_\_\_ Date       Feb. 16, 2017

STATE OF VERMONT  
PUBLIC SERVICE BOARD

Docket # 8816

Petition of Swanton Wind LLC

MEMORANDUM OF MARY HUNTER IN SUPPORT OF  
MOTION TO INTERVENE

I, MARY HUNTER, in support of the motion to intervene filed by myself and subject to the penalties of perjury, do hereby state the following facts which are true to the best of my knowledge and ability.

1. I reside at 87 Lebel Dr., St. Albans Vermont. My physical address is in St. Albans Vermont. Our home is approximately 4,300 feet from the project. The project will be audible and visible from our home.
2. We have lived at this address since April of 2005. The views and surroundings were some of the main factors in purchasing our homestead. Construction of this project will diminish our views and we have concerns about the auditory of our home.
3. Another key factor in purchasing our home was the peace and quiet of the surrounding neighborhood. We enjoy being outside - watching the night sky, photographing nature, etc. The project results would ruin the enjoyment.
4. My wife is susceptible to motion sickness, headaches, and sinusitis. There is concern that shadow flicker and air pressure will cause issues with her physical well-being.
5. We house an indoor-only cat. He is a big part of our family and being that the sun will rise behind this project every day, the shadow flicker is something in which our feline friend will have to deal with what he is seeing. It has been said that pets can run in circles chasing these shadows and are more susceptible to epileptic seizures. This can be life altering for them.

6. Being closer than 4,300 feet also concerns me with the proposed blasting and drilling for this project that my dwelling could be susceptible to damage. The foundation could crack, my water supply could be damaged or contaminated by this project.

7. We have a lot of wildlife visit our house over the course of a year. We have all types of birds we feed and love to watch. We also have deer and turkey. We enjoy listening to birds in a nice quiet relaxing atmosphere. All this tranquility will be destroyed by this project if it is approved.

8. If the project is approved it will send sediment from cements and petroleum based products from turbines and equipment to flow through the streams and into the Lake. Why would the state approve such projects that damage our beautiful Lake that we have spent millions on to preserve and protect?

9. This area is a main passage for our Canadian geese which fly around here in flocks of hundreds twice a year. They use the corn fields at the bottom of the hill to bed down for the evening while migrating in either direction seasonally. They definitely are at heights below 500 feet that we will surely lose many due to this flight path having these turbines with their spinning propellers injuring and killing some. They fly from the Fairfield pond to the corn fields to bed and feed as a routine. Sad to have this taken from them, as well.

10. A very major concern is the real estate value. We have worked hard all of our lives to purchase a beautiful home. I have been told by realtors that your home's value will diminish after a project like this has been approved.

11. The quiet and peaceful atmosphere will be ruined by the sounds and sites of Industrial turbines. Eventually the water could become contaminated by the run off from the ridge and from the construction of this project.

12. We do not have central air and, therefore, typically live with open windows and doors during nice weather days. The audible component will make that infeasible and the shadow flicker component will require light sensitive window treatments. Thereby, these issues will be impacting our comfortable lifestyle. The noise distraction will make sleeping a very stressful situation, as sleep is an important Part of our health, as well.

*Mary A. Hunter*

Mary Hunter

Date: 2/16/2017

STATE OF VERMONT  
PUBLIC SERVICE BOARD

Docket No. 8816

Petition of Swanton Wind LLC for a certificate of public )  
good, pursuant to 30 V.S.A. § 248, for the construction )  
of an up to 20 MW wind-powered electric generation )  
plant powered by up to 7 wind turbines located along )  
Rocky Ridge in Swanton, Vermont )

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**CERTIFICATE OF SERVICE**

We, Brian and Penny Dubie, et.al., certify that on February 16, 2017, copies of the foregoing *Notices of Appearance*, and *Motion to Intervenes of Brian and Penny Dubie, Jeanne Royer, Judith and Patrick Luneau, Karen and Leo McLaughlin, Sally and Bruce Collopy, Kaye and Frank B. Mehaffey, Jr., Terrance Smith, David A. Goodrich, Robert Perkins, Patricia Messier, Sarah & Ed Ferguson, Ian and Danielle Garrant, Curtis Swan and Sara Luneau-Swan, Dan and Nancy Dunne, Erynn & Tyrell Boudreau, Dennis Hendy and Diane Bell, Mary and Mark Bushey, Steve Woodward, Kenneth Fox, Michelle and Luc Deslandes, David Butterfield, Bradley Stott and Jennifer Belanger, Clark and Carol Palmer, Paula Pearsall, Greg Pierce and Paula Kane, Mark and Marianne Dubie, Marie and Gil Tremblay, Patricia Rainville and John Smith, Kevin and Dolores Nichols, Jessica Decker and Lance Desautels, Suzanne Seymour, Mary Hunter, Todd Poirier* in the above-referenced matter, were served via First-Class U.S. Mail on the interested persons designated in the following Service List.

Respectfully submitted this 16<sup>th</sup> day of February, 2017.

By:



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