

## SITE EVALUATION COMMITTEE

Docket No. 2015-04

### APPLICATION OF EVERSOURCE ENERGY FOR A CERTIFICATE OF SITE AND FACILITY FOR CONSTRUCTION OF THE SEACOAST RELIABILITY PROJECT

#### SUPPLEMENTAL DIRECT TESTIMONY OF Helen H. Frink, July 20, 2018

**Q. Please state your name, address, and position.**

A. My name is Helen Hiller Frink. My address is 24 Clark Road, South Acworth, NH 03607. As an intervenor and consulting party in SEC Docket 2015-04, I represent the Darius Frink Farm at 272 Nimble Hill Road in Newington. I am co-owner with my brother, John Darius Frink, and sister, Sara (Sally) Frink Ryder.

**Q. What is the purpose of your supplemental testimony?**

A. I will discuss issues that have arisen or changes that have occurred since filing my original testimony approximately one year ago.

**Q. What environmental issues impacting the Frink Farm have changed since your original pre-filed testimony?**

A. In a Memorandum of Understanding dated January 24, 2018 with the Rockingham County Conservation District (RCCD, holder of a farmland conservation easement on the property), Eversource agreed to specific protections of soil and water on the Frink Farm during construction of the SRP line. The most significant of these can be summarized as follows:

Concentrations of Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS), collectively referred to as perfluorinated compounds (PFCs), detected in monitoring wells B101(MW), B102(MW) and B103(MW) in September 2016 and June 2017 were below the NHDES Ambient Groundwater Quality Standard (AGQS) of 0.070 µg/L. According to the NHDES Env-Wq 402 regulations, since concentrations of PFCs were below the AGQS, direct discharge of groundwater to the ground surface in an infiltration basin is permissible. Nonetheless, Eversource agrees to recover groundwater from all excavation areas where necessary to facilitate construction and to employ one or a combination of the groundwater management methods as specified in the attached GEI "*Soil and Water Investigation and Management Plan Darius Frink Farm Newington, New Hampshire November 17, 2017*". These methods include treatment and discharge to surface water under a NPDES Remediation General Permit, or offsite disposal.<sup>1</sup>

<sup>1</sup> The "*Soil and Water Investigation and Management Plan Darius Frink Farm Newington, New Hampshire November 17, 2017*" and the Memorandum of Understanding dated January 24, 2018 with the Rockingham County Conservation District were provided to parties in response to a data request from the May 16, 2018 technical session.

Subsequent to this agreement encompassing groundwater management, surface water in Knight's Brook Tributary was tested on March 12, 2018. Levels of known contaminants have risen significantly. PFOS (perfluorooctanesulfonic acid) was measured at a level of 2.30 µg/l (micrograms per liter) and PFOA (perfluorooctanoic acid) at 0.79 µg/l (micrograms per liter). The EPA standard for Ambient Groundwater Quality is 0.07 µg/l (micrograms per liter) for both of these toxins. The March, 2018 tests show that PFOA is **10 times as high** as the AGQS and PFOS is **32.8 times above** the EPA limit. (Please see attachment 1). These tests were conducted for the US Air Force by Wood E&IS. I forwarded them on June 6<sup>th</sup> to Kurt Nelson at Eversource.

Because the SRP line will be buried beneath the brook and adjacent wetlands, construction poses additional risks and expense, such as the treatment of water onsite or its offsite disposal. The Frink family is concerned that Eversource seems to turn a blind eye toward this issue. Eversource has tested for PFCs only at the 3 monitoring wells located where poles would have been placed for an overhead line, ignoring or bypassing the more heavily contaminated brook and adjacent wetland. Furthermore, we are concerned about the number and weight of trucks used to dispose of contaminated water and excess soil offsite, and the impact of trucking from the brook through our hayfields out to Nimble Hill Road: dust, noise, and soil compaction.

**Q. How will the requirement to handle PFC contamination affect the true cost of the project described in the March, 2017 amended application?**

**A.** Eversource has not provided this information. As noted above, Eversource's Memorandum of Understanding dated January 24, 2018 with the Rockingham County Conservation District obligates the utility to an un-estimated added expense of treating or disposing of contaminated water and excess soil on the Frink Farm. In its July 1, 2018 comparison of jet plowing under Little Bay with the cost of horizontal directional drilling, Eversource uses the outdated March, 2017 estimate of "\$84 million (-/+ 25%)." (p17). Evaluation of the financial impact of the project must include accurate estimates for dealing with PFC contamination.

**Q. How has the Applicant addressed concerns related to the siting of a 75-foot monopole on the Frink Farm, which is listed on the National Register of Historic Places?**

**A.** Environmental Map 21 provided by the Applicant in Appendix 2a of the Amended Application (March, 2017) shows the "Historic Sites" demarcation **east** of the transition structure. In my July, 2017 pre-filed testimony, I pointed out that this demarcation is false. The entire Darius Frink Farm, including the location of the transition structure, is on the National Register. The maps shared at the June 26<sup>th</sup> bus tour contain the same error. An accurate map would show the 75-foot monopole clearly **within the area designated on the National Register of Historic Places.**

I attended the June 26<sup>th</sup> bus tour that included historic sites in Newington and Durham. No representative from the New Hampshire Division of Historical Resources was present. That agency's "Historic Property/Properties Affected Table Results Of Effect Evaluation" calls out the transition tower and states: "The proposed project will introduce a visual element that diminishes the setting of the open field that is a character defining feature of the property."

Visual simulations shared at the bus tour plainly showed the 75-foot transition tower exposed by the cleared area beneath the overhead line on the Pickering property. Eversource provided an illustration of monopole that we were later told was not a current design, but we have never seen a definitive design to which the Applicant has committed.

The proposed Seacoast Reliability Project does not include a decommissioning plan. In my opinion, it represents a permanent “solution” to a temporary problem. When energy consumption declines, or when other utilities’ alternatives provide high voltage power to the Seacoast, superseding this project, Eversource’s 75-foot transition tower will forever scar the unobstructed view across our hayfields, a prime component of the conservation value of our farmland.

**Q. Does this conclude your supplemental pre-filed testimony?**

A. Yes, it does.