

Alexandra M. Dannis
James G. Dannis
117 McGinty Road
Dalton, NH 03598
sandydannis@gmail.com

December 22, 2016

PETITION TO INTERVENE

Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: New Hampshire Site Evaluation Committee ("SEC")
Docket No. 2015-06 -- Northern Pass

Dear Ms. Monroe:

We respectfully request to intervene in the SEC's proceedings under Docket No. 2015-06 relating to the proposed Northern Pass transmission line. Per the SEC's regulations, we are sending this request to you, with copies to the SEC's distribution list for this proceeding as noted in the "cc" below.

We live in Dalton, NH and own property in Dalton. As described in more detail below, we travel regularly in and around Coos and Grafton counties as part of our day-to-day activities.

Our particular rights, duties, privileges, immunities or other substantial interests that may be affected by the SEC's Northern Pass proceedings include the following:

1. Close proximity. Northern Pass's preferred route in Dalton comes within approximately 1.25 miles of our property along Faraway Road (Dalton tax map parcel 409-063). The construction of Northern Pass's transmission lines in such close proximity to our land would impair the marketability and value of our land and our use and enjoyment of the land.
2. Adverse visual impact. The construction of Northern Pass's transmission lines on the preferred route in Dalton will have a material adverse visual impact on the portions of our property located at and around one of the summits of Dalton Mountain (locally known as "Spruce Knob" -- elevation 2076'), along the ridge line of Dalton Mountain and at lower elevations on the east side of Dalton Mountain (Dalton tax map parcels 409-016 and 409-063). This summit, ridge line and east-facing slope (rising approximately 900' above

the valley) are defining parts of our property. The setting is characterized by open, long-range views including to the Presidential Range, Cherry Mountain and the ridges and valley below. The visual features in the valley include Burns Pond, Forest Lake, the Pondicherry preserve and Chase Bog. Northern Pass's transmission lines would be located less than two miles to the east from the main viewpoints on this part of our land -- viewpoints that we access directly from our trail system and enjoy year-round. The lines would be clearly visible from our land and would create a jarring, unnatural, ugly scar across a remarkable view. They would disrupt the setting, significantly impair the viewshed and thereby impair the marketability and value of our land and our use and enjoyment of our land.

We emphasize that the transmission lines would be less than two miles from these high-elevation viewpoints on our land. By comparison, the US Department of Energy ("DOE") uses a 10 mile "visual impact zone" to assess similar visual impacts from Northern Pass. The SEC's proposed rules use a 10 mile "area of visual impact" for rural transmission lines built on existing rights of way where tower heights are increased, as is the case for this segment of the Northern Pass line.

3. Adverse effect on recreation. The portions of our property along the ridgeline of Dalton Mountain and on the east slope of the mountain are wild, remote, natural and unimpaired. They have high recreational value. Construction of Northern Pass less than two miles away and within full view would damage the setting and recreational values and impair the marketability and value of our land and our use and enjoyment of our land.

We note that this part of our property is sandwiched between neighboring properties (also on the east side of the ridge) that are specifically highlighted by the DOE for high recreational value, including Forest Lake State Park, Greason Forest, Bradley Conservation Easement and Dana Forest (see DOE's draft environmental impact statement, July 2015, p. 3-65).

4. Damage to overall property. The portions of our property along the ridgeline of Dalton Mountain are integral drivers of the overall setting, use and value of our property. Northern Pass's transmission lines would therefore impair the marketability, value and our use and enjoyment of our property as a whole. Our property consists of approximately 1700 acres and has significant investment value.
5. Alternative route across property. In an earlier DOE filing, Northern Pass proposed an alternative route through Dalton directly across more than 1.5 miles of our property. This route would cross significant fields, forests, wetlands, viewsheds, historic homesteads, wildlife habitat and other features. This route would directly and substantially impair our property. While Northern Pass advised the DOE that it no longer supports this route, to our knowledge this route has never been withdrawn in a legally binding and enforceable

manner. We do not know whether Northern Pass may seek to introduce this route as part of the SEC review. Northern Pass's agent, in a conversation with us, told us there is always a potential for this route to be used. Unless and until this route is fully withdrawn in a legally binding and enforceable manner, this route threatens and impairs our property.

6. Another route considered across our property. In another earlier DOE filing, Northern Pass disclosed that it considered yet another route directly through approximately 0.7 miles of our property in a different area along an existing PSNH transmission line right-of-way. The existing poles on this right-of-way are wooden. They blend with and do not exceed the height of the surrounding trees. Northern Pass's proposed metal towers (if sized similarly to those on the preferred route) would extend well above tree line, clash with the natural surroundings, have much larger mass and visual cross-sections and substantially impair our property. While Northern Pass indicated to the DOE that it does not support this route, we do not know whether Northern Pass may seek to introduce this route as part of the SEC review. Unless and until this route is fully withdrawn in a legally binding and enforceable manner, this route threatens and impairs our property.
7. Town-wide stigma from Northern Pass. Northern Pass's preferred route crosses a substantial part of Dalton with damaging above-ground lines instead of the less impactful buried lines proposed for other towns both south and north of Dalton. Northern Pass thereby creates a stigma for our town as one of the small group of New Hampshire's "loser towns" -- that is, towns with insufficient political weight to protect themselves (via successfully insisting on line burial) from Northern Pass's degradation. This town-wide stigma impairs the marketability and value of our land as well as our use and enjoyment of our land.
8. Road crossings and viewscapes in the area. Dalton has very limited services. Our day-to-day activities -- shopping, recreation, athletic training, medical, etc. -- take us regularly from our home in Dalton to the surrounding towns of Whitefield, Lancaster, Littleton and Bethlehem and well beyond. These trips generally involve multiple crossings of Northern Pass's preferred route for which above-ground lines are proposed. Crossings in the surrounding towns that we regularly use include Faraway Road and Route 142 in Dalton; Forest Lake Road, Route 3 and Route 116 (two crossings) in Whitefield; North Road and Route 2 in Lancaster; and Route 116 in Bethlehem. We also frequently use federal and state-designated scenic and cultural highways crossed by Northern Pass. Our regular daily activities will thus be subjected to the jarring visual impact of the massive above-ground lines Northern Pass proposes for these towns and highway areas.

As we have demonstrated above, our interests as affected property owners are direct and substantial and are clearly distinct from the interests of the public at large. New Hampshire law

has long recognized that every property is unique and distinct. We respectfully submit that there can be no serious argument against granting intervenor status to property owners such as ourselves whose properties would be directly impaired by Northern Pass and who seek to defend their properties against damage from Northern Pass.

We respectfully request that our intervention status not be limited or conditioned in any manner. In support of this part of our request, we would submit the following:

1. Our property includes significant features that run the full gamut of the SEC's statutory and precedential touchstones, including natural features (historic field and farm land, wetlands, Connecticut River frontage, varied forest types, varied wildlife habitat, ridge lines, mountain tops, bogs, mesic forests), historic features (more than 12 historic pre-Civil war farmsteads, old school sites, cliffs from the "Lover's Leap" legend) and aesthetics (combination of fields, forests, mountains and local and long-range views), as well as a location and critical mass that are significant for local and regional land use considerations.
2. Impacts on our property are directly relevant to areas for which the SEC must make findings, including property values, economic effect, orderly development of the region, aesthetics, historic sites, natural environment and the public interest. We therefore wish to have the opportunity to provide testimony (including, at our option, expert testimony) and to cross-examine in all of these areas, without limitation.
3. Our professional backgrounds and experience include finance, law, utility projects, property development, valuation and land use/planning. We wish to have the opportunity to deploy this knowledge and experience personally and directly in defense of our property interests.
4. Our property interests are unique and substantial. To lump us together with others or to limit our procedural rights would impair our ability to protect our property in an effective manner. We believe this would deprive us of our rights as property owners under the federal and state constitution and applicable statutory protections.

Thank you for your consideration of this petition.

Sincerely,

Alexandra M. Dannis

Alexandra M. Dannis

James G. Dannis

James G. Dannis

cc: SEC distribution list for Docket No. 2015-06.