January 25, 2016

TO: Pamela.Monroe@sec.nh.gov
Administrator, NH Site Evaluation Committee

CC: [TODAY'S DISTRIBUTION LIST, RESPONSIBLE ENERGY ACTION LLC]

FROM: Douglas Evelyn
Secretary, Board of Trustees
Ammonoosuc Conservation Trust

SUBJECT: Petition to Intervene, SEC Docket No. 2015-06

Dear Ms. Monroe,

As encouraged during the SEC presentation in Lincoln January 21, 2016, the Ammonoosuc Conservation Trust (ACT) wishes to intervene in the SEC’s proceedings under Docket No. 2015 - 06 relating to the proposed Northern Pass transmission line. In keeping with 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" above.

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

The Ammonoosuc Conservation Trust is a nationally accredited regional land trust formed in 2000 and protecting over 3000 acres of land in the 22 towns we serve in northern Grafton and Coös counties. The mission of the Trust is: to encourage land conservation as an integral part of the growth and future well being of New Hampshire’s North Country, through conserving places with ecological, historic, community, or scenic values. We especially focus on conserving the farms and working forests that are the foundation of our region’s economy and character.

The currently proposed preferred and alternative routes of the transmission line would directly affect our service area and mission. The proposed routes passing through (north to south) the towns of Pittsburgh, Clarksville, Stewartstown, Dixville, Millsfield, Dummer, Stark, Northumberland, Lancaster, Whitefield, Dalton, Bethlehem, Sugar Hill, Franconia, and Easton are within our service region. We currently hold easements in Lancaster, Littleton, Bethlehem, Sugar Hill, and Easton. A large proportion of our membership will also be directly affected by the project as well as landowners whose properties are crossed by the proposed or existing right of way or who are within view of it.

ACT has been accepted as an intervener to the federal Department of Energy process regarding OE Docket No. PP-371 and as a consulting party for that project's Section 106 reviews. We have filed comments throughout the DOE/EIS and 106 process (August 31, 2014, July 10, 2015); testified in regard...
to the SEC process (9/8/2014, 1/21/2016); and advised local communities and landowners on potential impacts of the proposed project on conservation lands and on the use and protection of lands and natural resources in our service area. We work collaboratively and constructively with local, state, and national conservation commissions and organizations, and have received significant grant support and recognition for our work from state and federal level agencies, foundations, and environmental groups. Current activities include building regional food systems depending on conserving and revitalizing agricultural lands within the impacted area and protecting native brook trout populations in NH state recognized waters that are potentially impacted by the proposed project. We hold an easement on and advise a multi-town (Sugar Hill, Easton, Landaff, Franconia) c. 700 acre Community Forest project immediately proximate to the proposed line and being developed as a center for public education and recreation -- funded with grants from federal and state sources, and private contributions. We have responsibilities and duties to represent the interests of the grantors and ongoing participants in this project.

We believe we have a direct and substantial interest in the outcome of this proceeding, that our interests cannot be adequately represented by other parties, and that we are entitled to intervene in this proceeding.

ACT brings significant expertise and a record of collaborative work with state agencies that can inform the SEC deliberations. In addition to the expertise of our staff, our board includes members with decades of experience in land and historic resource protection.

ACT also recognizes the need of those granted intervener status to serve in the interest of justice, in regard to the provisions of RSA 541-A:32 II: "The presiding officer may grant one or more petitions for intervention at any time, upon determining that such intervention would be in the interests of justice and would not impair the orderly and prompt conduct of the proceedings."

ACT is concerned with potential project impacts: on water systems within the Ammonoosuc river watershed; on cultural and natural landscapes that contribute to appreciation of the history and traditional economy of the region we serve; and on the natural resources of conservation properties. ACT is dedicated to protecting the values of wildlife habitat, public recreation, scenic view sheds, intact working forests, and an economy benefiting from sustaining traditional patterns of use and protection of our region’s land and landscapes.

For these reasons, the Ammonoosuc Conservation Trust respectfully requests the NH SEC to grant it Intervener status in regard to SEC Docket No. 2015-06, in recognition of its particular rights, duties, and privileges, as well as its ability to illuminate the decision-making process and contribute to its timely execution.

Thank you for your consideration of our request.

Sincerely,

Douglas Evelyn, Secretary, ACT Board of Trustees
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cc: SEC Distribution list (as of the date of this email) for Docket No. 2015-06