

STATE OF NEW HAMPSHIRE SITE EVALUATION COMMITTEE

Docket No. 2015-06

Joint Application of Northern Pass Transmission, LLC
and Public Service Company of New Hampshire d/b/a Eversource Energy
for a Certificate of Site and Facility

Pre-filed Testimony of Rebecca Weeks Sherrill More, Ph.D.,
Intervener, representing the Weeks Lancaster Trust,

part of the Non-Abutter Group: Stark, Northumberland, Lancaster, Jefferson, Whitefield,
Dalton, Bethlehem [NAPO-SB]

**Regarding Weeks State Park,
Lancaster New Hampshire**

November 15, 2016

Please state your name and qualifications:

My name is Rebecca Weeks Sherrill More, Ph. D. I hold a Ph.D in History from Brown University. I have taught history at Brown University and the Rhode Island School of Design (RISD), as well as lectured and published in my areas of social and economic history. I also served as founding director of the Harriet W. Sheridan Center for Teaching and Learning at Brown, working with the Center from 1989 until my retirement in 2010. Since 2010, I have held the position of Visiting Scholar in the department of History at Brown University. I retired from teaching history in the Division of Liberal Arts at RISD in 2014.

Of relevance to my testimony regarding Weeks State Park, I have extensively used in my research and teaching artifacts, including architecture and land use, as primary historical source material.

In addition to being a beneficiary of the Weeks Lancaster Trust, I have served on the Plymouth State University President's Council (2007 - 2017) and the Advisory Council for Plymouth State University's Museum of the White Mountains (2014 - present). I have also served on the Weeks Medical Center Board of Trustees (Lancaster NH) since 1996.

Please describe your interest in this matter?

I represent the Weeks Lancaster Trust, Interveners in the State of New Hampshire Site Evaluation Committee, Docket No. 2016 - 06. The Weeks Lancaster Trust was established by my grandfather, the Hon. Sinclair Weeks, Senator and Secretary of Commerce in the Eisenhower Administration. I am a great-granddaughter of John Wingate Weeks, native son, sponsor of the Weeks Act of 1911 and builder of the 1913 *National Register* Lodge and Observation Tower on Mt. Prospect in Lancaster NH. In 1941 Sinclair Weeks and his sister, Katherine Weeks Davidge, gave much of the John Wingate Weeks estate on Mt. Prospect to the State of New Hampshire for a State Park to celebrate the reclamation of New Hampshire's forests through the agency of the Weeks Act. I have also represented The Weeks Lancaster Trust as an Intervener in the US Dept of Energy's Environmental Impact process, as well as a Consulting Party for the Section 106 Review.

What is the purpose of this pre-filed direct testimony?

The purpose is to ensure that the S.E.C. sub-committee is fully aware of the inadequate assessment by the experts employed by the Applicant concerning the impact of the proposed Northern Pass on Weeks State Park and, therefore, the entire area from Cape Horn in Northumberland to Bethlehem.

Among the many locations throughout New Hampshire that will be negatively impacted by the proposed NPT Towers, few are as iconic as **Weeks State Park (WSP)** on Mt. Prospect in Lancaster, four miles to the north of and easily visible from the Mountain View Grand. The negative impact that the 80' - 110' Towers¹ would have on the visitor's experience at Weeks State Park exemplifies their impact on the environmental, cultural and historic, and economic resources of New Hampshire. The WSP has scenic outlooks along its historic 1912 winding drive, the Mountain Road, the State of New Hampshire's first Scenic Byway, to the summit.² The summit is topped by a 1912 stone Fire Tower and a unique-to-New Hampshire 1913 Arts & Crafts style National Register of Historic Places home of John Wingate Weeks.³ For the thousands of visitors each year, the Lodge, Fire Tower and Park symbolize Weeks's crucial role in the creation of the White Mountains National Forest (1918) and the painstaking reclamation of lands stripped of trees by the nineteenth century logging industry over the past 104 years.

Weeks State Park commands a 360o view which includes: the entire Presidential Range from Mts. Madison to Moosilauke, both the northern and southern sections of White Mountain National Forest, the Connecticut River valley from the Percy Peaks to Gilman, west to Camel's Hump Mountain near Burlington Vermont and the ranges of the Northeast Kingdom of Vermont as far as Mt. Monadnock near

Canaan. It would be a tragic irony to have giant metal Towers march through the proximate view-shed of this icon of outdoor wilderness and national forests. They do not come to see power line Towers, such as mar the Quebec landscape in every direction.

The Weeks State Park lands were entrusted to the State in 1941 by Sinclair Weeks and Katherine Weeks Davidge to honor their father, Lancaster native John Wingate Weeks. US Congressman, Senator and Secretary of War Weeks sponsored the Weeks Act of 1911, which established federal guidelines for conserving our national Forest Reserves and the quality of our national water supply. The White Mountain National Forest today owes its existence to the Weeks Act. In the 1913 Lodge atop Weeks State Park, visitors learn about the history of sustainable forestry in New Hampshire. They can see for themselves that governmental protection can result in environmental, economic and cultural benefit to an entire region.

Out of concern for the future of Weeks State Park, the descendants of John Wingate Weeks, as the Weeks Lancaster Trust, filed in 2013 to intervene in the matter of the NPT LLC application for a Presidential Permit with the US Department of Energy. In July 2014, we filed a Statement on the Historical and Cultural Impact of the NPT on the township of Lancaster under NHPA (1966) Section 106 as a Consulting Party.

In acknowledgment of the importance of Weeks State Park, the U.S. Department of Energy (US DOE) selected Weeks State Park as one of its 15 Key Observation Points (KOP #LA-2a) for the assessment of environmental impact. The US DoE's Draft EIS notes that Weeks State Park would be subject to at least thirty-four (34) visible structures, over twice the existing fifteen (15), less visible at 45' in height. The Application to the SEC states that only eight (8) towers would be visible from WSP. However, depending upon the time of year (Leaf-On/ Leaf Off) the view from WSP may include approximately two-hundred and nineteen (219) 80 - 110' towers from Cape Horn State Park in Northumberland to Whitefield.

In what way have the materials supplied by the Applicant failed to assess the Impact of the Project on Weeks State Park?

1) The Historic Assessment of Weeks State Park by the Preservation Company is contained in App. 18. pp. 454 and 466- 499.⁴ The Appendix 18 Assessment includes both Historical Assessment and Viewshed Analysis. While a checked box does indicate (p. 4/34) that the Project will have an "Adverse Impact" on WSP, the Applicant's expert's conclusion is that the Project is not significant from the Observation "Lookout" Tower except in one (SE) direction. It further concludes that the only significant view of the Project would be from the East Overlook.

However, these conclusions are subjective projections, which opine that, Towers of 90' and over, when viewed from the Lookout Tower, will be "minimally discernable." The conclusions: 1) do not account for the specific data on the Project; 2) are based on the false premise that the existing vegetation, as portrayed in the photographs from Weeks State Park in Appendix 18, at any location on the Mountain Road or the Summit will remain just as it was in 2013 when the Applicant had the site assessed. However, vegetation is not a static entity, it grows, dies or may be removed. If the State were to return the Summit to its treeless, open 1913 appearance, then the entire Project would be visible from Cape Horn to Bethlehem; 3) the photographs shown are also exclusively "Leaf-On." When DeWan Assoc. provided "Leaf Off" Visual Simulations, they provided them only from the East Overlook. But many visitors hike up Mt. Prospect year round. It is one of the State's "First Hike" sites for New Year's Day. First Hikers would have a superb view of the project even without access to the Lookout Tower.

2) The NPT Application materials state that eight (8) Towers will be visible - because NPT only counted the new 320-kV HVDC Towers, and did not include the relocated *new* 115-kV towers carrying the existing line. First, using the KOP, the number eight (8) is incorrect (12-15 is more accurate depending on leaf-on/leaf off). However, if the more appropriate Summit of Weeks State Park were used, the NPT Route Maps indicate that two Hundred and nineteen (219) Towers, each hung with 4 or 5 tiers of wires, in

two (2) parallel lines between Cape Horn State Forest in Groveton and the Mountain View Hotel, would be clearly visible to the Park's Visitors (<http://www.northernpass.us/towns.htm>: Route Maps #52 - 65). From Whitefield on to Bethlehem, more Towers and Lines would be visible. From Mt. Washington itself, the NPT's wall of lines and Towers, as well as the clear-cut pathway, would be visible to the thousands of visitors there.

3) Assessment of the Key Observation Point (KOP #LA-2a) from Mt. Prospect, Weeks State Park Lancaster NH is based on several erroneous assumptions. In the *Visual Impact Assessment*, T. J. Boyle Assoc., the contractor hired by NPT, states the "existing view from this KOP is of high quality. The Weeks State Park is a significant state resource that is visited throughout the year."⁵ KOP #LA-2 is based on one (1) Lookout on the eastern side of the auto road up Mt. Prospect that has a narrow view, restricted by surrounding trees and shrubbery to a specific E/SE direction. The Lookout was selected by Boyle Assoc. for the KOP because "it offers a more direct and closer view of the existing corridor" - an example of the errors perpetrated by the 1-mile APE. However, the *Summit* of Mt. Prospect is crowned by an historic 1913 Stone Observatory Tower that commands 360o panoramic views of the entire region. Boyle Associates states that it did not choose to use the *Summit* for its assessment for the following reason, "The fire observatory is locked when inactive, and the views from immediately below the fire observatory do not offer a wide view of the existing transmission corridor due to the enclosed nature of the stone fire tower itself, which obstructs the view." This is false information: a) the Lodge and Lookout Tower/Observatory are open at the same time as the Auto Road, therefore any of the several thousands of annual Visitors coming by that route would be afforded the opportunity of the full Panoramic View, not just the one from the restricted Lookout; 2) The Lookout Tower is not "enclosed" as stated by Boyle Assoc., therefore the view is not "obstructed." Boyle Assoc. does not appear to have climbed the Lookout Tower nor entered the Lodge to make a full assessment of Visual Impact from the Summit. The assessment concludes that "The proposed HVDC structures and some new right-of-way clearing would be visible from this location (the KOP)", but UNDERESTIMATES the Impact by an extraordinary amount.

4) A comparison of the data provided in the Northern Pass Public Outreach Maps—Preliminary Design Supporting Information with that in "Visual Photo Simulations" by T. De Wan Assoc. do not appear to support each other. For example, the cross-section diagrams provided in each section are not to scale. The trees (45' high relative to the existing 45' high poles) are drawn to appear to be almost the same height as the NEW Towers. Careful comparison of the Structure Heights given in the accompanying Table with the cross-section reveal that most of the *new* Towers should be depicted as more than DOUBLE the height of the trees (90+ to 120'). Had these cross-sections be done to scale, then the Data provided to the DOE would be accurate and the EIS would realize accurate conclusions. Furthermore, several types of "weathering monopoles" are depicted - are these what is proposed? As a result of the inaccurate cross-section diagrams, the depicted "monopoles, as well as the inadequate KOP, the "Photo-simulations" from Weeks State Park do not accurately reflect what the proposed Towers would actually look like and, therefore, underestimate the Visual Impact. Note also that the dates of the photos provided vary widely, are missing in the case of large photos, and are inconsistent from one site to the next.

What documents have you reviewed regarding the Northern Pass Project?

I have studied the following materials: 1) The Northern Pass Transmission LLC Application (both the Original Route and the Alternate Route) to the SEC (Docket No. 2015-06), especially all materials relating to Weeks State Park; 2) the Project maps; 3) the Historic Resources Assessment by the Preservation Company (Appendix 28) and the Visual Simulations by DeWan Assoc. (Appendix 17); 4) the U.S. Dept. of Energy's Draft EIS; 5) the relevant Project Area Forms prepared by SEARCH for review by the New Hampshire Division of Historical Resources. Finally I have devoted over fifty (50) years as an historian to studying the social and economic history of Coös County, including its landscape and architecture from the township grants under Royal Gov. Benning Wentworth to the present.

How would the Northern Pass Project affect Weeks State Park and therefore the economic well being of the region from Cape Horn in Northumberland to Bethlehem?

As consistent with RSA chapter 162-H, the negative impact of the NPT Towers on Weeks State Park will undermine the overall economic growth of the state, adversely impact the historic sites along the proposed route, and be contrary to the welfare of the population and environment of the State of New Hampshire. With regard to Coös County, the northern third of the State, the NPT will jeopardize the tourist and recreation industries that are its best hope for future economic growth.

What else would you like the Site Evaluation Committee to consider regarding the negative impacts of the Project?

It would be in the Public Interest to subject the findings of the Applicant's experts to rigorous assessment by experts not in the employ of the Applicant and receiving financial remuneration for their conclusions. For example, the S.E.C. might wish to cross-reference the findings of the Preservation Company with the Project Area Forms submitted to the NH Division of Historic Resources under the aegis of the U.S. Dept. of Energy's EIS, Section 106 Review Process. The S.E.C may also wish to consider the expertise of the ACHP or other independent experts without financial benefit from the Application.

¹ See the Applicant's Project Maps #s 50-72 for the area from Cape Horn, Northumberland to Bethlehem for the proposed height and type of Transmission Towers.

² The Mountain Road was established in 1994. See the NH DOT *Report of the NH Scenic & Cultural Byways Council For the years 2013-2015*, p. 19.

³ See NRHP #85001190 (1984) and Bryant F. Tolles, Jr., *Summer Cottages in the White Mountains: The Architecture of Leisure and Recreation*, 1870 to 1930 (2000)

⁴ Weeks State Park- the John Wingate Weeks estate (ID: LANC02) comprising Buildings and 2.91 acres on summit of Mount Prospect National Register (NRHP #85001190) listed.

⁵ Boyle Assoc.: July 10, 2015: http://media.northernpasseis.us/media/Visual_Impact_Assessment.pdf, p. 271.