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**Subject:** NH SEC 2015-06: Amended Prefiled Testimony of Harry Dodson  
**Date:** Wednesday, January 11, 2017 11:01:46 AM

Ms. Monroe:

Attached please find the **Amended Pre-filed Testimony of Harry Dodson submitted on behalf of the Society for the Protection of New Hampshire Forests**. Please note that this Amended Pre-Filed Testimony corrects a typographical error on Page 2, Line 16, in that the word "Architecture" should have been the word "Architects." We request that the previously submitted Pre-filed Testimony of Harry Dodson be withdrawn in its entirety and replaced by this amended testimony. An original has been sent to you via First Class Mail.

A copy of the attached has this date been forwarded via email to all parties on the Distribution List.

If you have any questions or concerns, please do not hesitate to contact us.

Thank you,  
Nicole



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## Nicole M. Manteau, Firm Administrator

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THE STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE  
DOCKET NO. 2015-06

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

AMENDED PRE-FILED DIRECT TESTIMONY OF HARRY DODSON

ON BEHALF OF THE SOCIETY FOR THE PROTECTION OF  
NEW HAMPSHIRE FORESTS

JANUARY 11, 2017

**Q: Please state your name and business address.**

A: Harry L. Dodson, 40 Main Street, Suite 101, Florence, MA 01062.

**Q: What is the name of your organization?**

A: Dodson & Flinker, Inc.

**Q: What is your current position?**

A: Principal.

**Q: What are your qualifications?**

A: I have more than thirty years of experience in the field of visual assessment, land use planning and design. I founded Dodson Associates (now Dodson & Flinker) in 1986 in Ashfield, Massachusetts. Since then, my firm has established an international reputation in the fields of landscape preservation, town planning, visual assessment, site design, regional planning and limited development. Prior to founding Dodson & Flinker, I was chief landscape architect for six years with the Massachusetts Department of Environmental Management. I hold a Master's Degree in landscape architecture from the Harvard Graduate School of Design, and a bachelor's degree in History and Literature from Harvard College. I am a Fellow of the American Society of Landscape Architects and have received the following awards: two Merit Awards from the American Society of Landscape Architects, a Historic Preservation Award from the National Trust for Historic Preservation, a Merit Award from the Boston Society of Landscape Architects and a Commendation for Design Excellence from the Copley Square International Design Competition. Additionally, I have received a Planning Award from the New England Chapter of the American Planning Association, a Boston Visions Competition Award from the Boston Society of Architects and a Commendation for Design Excellence from the Spectacle Island

1 Competition. Please see attached Resume for further details including relevant work experience,  
2 attached as Exhibit 1.

3 **Q. Have you previously testified before the SEC?**

4 A. No, but I have provided expert aesthetic testimony in the those matters listed in  
5 the attached, Exhibit 2 before the State of Vermont Public Service Board, the Vermont Natural  
6 Resources Environmental Commission District 8, and the Adirondack Park Agency, representing  
7 a range of clients including Entergy Nuclear the owner of Yankee Nuclear Power Plant, the  
8 Adirondack Council a non-profit organization, and representative citizen's groups.

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

10 A: Dodson & Flinker (D & F) has been engaged by the Society for the Protection of  
11 New Hampshire Forests (The Forest Society) and the Appalachian Mountain Club (AMC) to  
12 analyze the aesthetic impacts of the Northern Pass Transmission Project, as proposed in an  
13 application for certificate of Site Evaluation and Facility to Construct filed Jointly by Northern  
14 Pass Transmission, LLC (Northern Pass) and Public Service Company of New Hampshire  
15 (PSNH) (jointly the Applicant) before the New Hampshire Site Evaluation Committee (SEC).

16 **Q. Beyond your testimony, have you prepared information for the SEC to**  
17 **review?**

18 A. Yes, our work analyzing the aesthetic impacts is covered in our report: Visual  
19 Impact Assessment Northern Pass Transmission Project (our Report) attached as Exhibit 3 to my  
20 pre-file testimony and it includes a critique of the Visual Impact Assessment (VIA) prepared by  
21 Terrance J. DeWan & Associates (TD&A) on behalf of the Applicant.

1           **Q.     What have you considered to prepare this testimony and your report?**

2           A:     I considered the following:

3                   1.     The Joint Prefiled Direct Testimony of Terrence DeWan and Jessica  
4           Kimball dated October 16, 2015;

5                   2.     The DeWan Visual Impact Assessment (VIA) filed with the Application as  
6           Appendix 17;

7                   3.     The DeWan Updated VIA submitted February, 2016 with supplemental  
8           private property and leaf-off Photo Simulations;

9                   4.     Additional DeWan photo simulations submitted September 30, 2016;

10                  5.     Applicable statutes and regulations including SEC Rules Site 102.10, Site  
11           102.12, Site 102.14, Site 102.25, Site 102.26, Site 102.44, Site 102.45, Site 102.46, Site  
12           102.52, Site 102. 56, Site 301.05, Site 301.14, RSA 162H;

13                  6.     Portions of the Application dated October 19, 2015, including

14                   a.     Project Overview Maps

15                   b.     Executive Summary

16                   c.     Various other sections;

17                  7.     Data Requests and Responses related to aesthetics;

18                  8.     DOE Draft Environmental Impact Report including T.J. Boyle  
19           simulations;

20                  9.     Landworks simulations prepared for Northern Pass in 2012;

21                  10.    Appalachian Mountain Club Northern Pass Visual Impact Assessment  
22           2012;

1                   11.     NH Historic Sites and Cultural Landscapes Report for the SEC, Heritage  
2                   Landscapes, LLC.

3                   12.     Bureau of Land Management: Manual 8400 - Visual Resource  
4                   Management.

5                   13.     US Forest Service: Landscape Aesthetics - A Handbook for Scenery  
6                   Management.

7                   14.     Attended technical sessions on Aesthetics with Terrence DeWan on  
8                   September 30, 2016; and

9                   15.     Various pleadings to and decisions from the Site Evaluation Committee.

10                **Q.     What is your overall opinion of the project as it has been proposed with**  
11 **respect to the aesthetics?**

12                A.     The proposed project will have an unreasonable adverse effect on aesthetics. The  
13 proposed Project extends above ground along 132 linear miles, through scenic and visually  
14 sensitive landscapes. The Project introduces new transmission towers of a scope (132 linear  
15 miles with 32 new miles of corridor) and scale (1,829 new or enlarged towers up to 160 feet tall)  
16 that is significantly larger than any in New Hampshire's landscape today. Its overall visual  
17 impact is not comparable to any other single infrastructure project existing in the State today.

18                The Project's structures will rise well above tree height, and from numerous scenic  
19 vantage points they will be seen silhouetted along ridgelines. An entirely new above-ground  
20 transmission corridor will be cut through the Great North Woods Region in some of New  
21 Hampshire's most wild and remote areas. In addition to viewpoints identified and evaluated by  
22 TD&A and DOE, D&F identified 57 additional viewpoints where the proposed transmission

1 corridor would be visible. These are scenic resources as defined by SEC rules<sup>1</sup>. Nineteen of  
2 these additional sites will experience a moderate to severe degradation of views which will  
3 accumulate over the many miles of landscape the project traverses. All of these impacts  
4 individually and in combination will significantly affect the scenic integrity and intactness of a  
5 significant portion of the state's landscapes.

6 **Q. Please explain what elements or features of the Project impact the aesthetic**  
7 **character of the areas.**

8 A. First, the scope of the Project: The above ground portion of this project will  
9 impact 132 linear miles of the State from the Canadian border to almost the Massachusetts  
10 border. This includes approximately 40 miles of entirely new above-ground transmission line  
11 corridor.

12 Second, the scale of the Project: The project introduces 1,195 transmission towers  
13 ranging in height from 48 to 160 feet, with cleared corridors of up to 315' in width.<sup>2</sup> Another  
14 634 towers will be relocated. Towers of this height stand well above tree height, in some cases as  
15 much as 100 feet above the forest canopy. The proposed transmission towers, excluding wind  
16 turbines and radio towers whose impacts are more localized, would be some of the tallest  
17 structures in the state, and considerably larger than transmission structures commonly seen  
18 elsewhere in New Hampshire. The tallest of the proposed towers would be as tall as a 16 story  
19 building<sup>3</sup>, or about 10 feet taller than NH's State Capital Building (150 feet).

20 Third, features are silhouetted against the sky: In numerous instances the transmission

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<sup>2</sup> NH SEC Application for a Certificate of Site and Facility, October 19, 2015.

<sup>3</sup> Assuming the general definition of a building story being approximately 10 feet in height.



1 corridor crosses over ridgelines making it a highly visible and dominant feature in the landscape.  
2 The project's transmission towers and conductors are too frequently silhouetted against the sky,  
3 increasing their visibility and aesthetic impact. Structures such as towers or turbines are usually  
4 much more visible when silhouetted against the sky, especially when lit from behind or seen  
5 against a backdrop of clouds. Even distant towers can stand out when seen this way.  
6 Silhouetting can be consistently observed under many predictable weather and lighting  
7 conditions, and times of day. The Applicant's visual impact assessment discounts the role of  
8 silhouetting and their simulations, often underrepresenting this effect.

9 Fourth, there are overall impacts to the tourism regions of New Hampshire: While  
10 portions of the transmission line are proposed to run underground in the White Mountains area,  
11 significant visual impacts would still result within four of New Hampshire's named "tourism"  
12 regions: The Great North Woods, the White Mountains, the Lakes Region, and the Merrimack  
13 Valley. In the sparsely developed northern forest portions of the state, the proposed project will  
14 cut through a relatively unspoiled scenic landscape. In the central and southern portions of the  
15 project, the height of the structures and additional clearing within the ROW will greatly increase  
16 the aesthetic impacts of the transmission lines. In more densely populated regions, scenic  
17 villages, residences, and neighborhoods will be directly impacted by the project.

18 **Q. In your professional assessment, why do you think TD&A's VIA reached a**  
19 **different conclusion than you did regarding the impact of the Project on aesthetics?**

20 A. The Applicant's methodology suffers from several major flaws which you can  
21 read about in more detail in my report including a detailed review of the TD&A methodology in  
22 Appendix C to my Report attached as Exhibit 3. In summary, those flaws combined result in his

1 no unreasonable adverse impact conclusion:

2 1) The filtering methodology eliminates many viewpoints and scenic districts that  
3 contribute to the aesthetic quality of New Hampshire's tourism regions. The methodology  
4 results in surprisingly low impact scores. There appears to be little connection between the major  
5 aesthetic impacts shown in many of the simulations and the relatively low impact scores that  
6 result from the analysis.

7 2) The methodology breaks the visual landscape down so finely that all aesthetic effects  
8 average out to, at most, a moderate impact. The methodology also reduces ratings for most  
9 scenic resources not officially recognized for state or national significance, which contradicts the  
10 NH SEC rules defining scenic resources as more than just those officially designated.

11 3) The distinctive regional character and scenic resources of the various landscapes  
12 through which the project passes is ignored in the analysis. While the analysis is broken down  
13 into linear segments, the fact that the Great North Woods has a character that is distinct from  
14 other landscapes, such as the White Mountains, is not discussed. Even general landscape  
15 characteristics were only superficially considered. There is little discussion of the values of  
16 agricultural land, for example, in both enhancing landscape character and the opportunity for  
17 distant views toward both positive and negative elements.

18 4) The scope and scale of the project, including the overall area of the state impacted, size  
19 of the towers and the additional clearing in relation to the existing condition, is ignored in part or  
20 in whole in the analysis. Nor does the analysis discuss the extent to which the Project would  
21 dominate the landscape.

22 5) Simulations prepared by the Applicant portray the proposed project from a

1 considerable distance and often from the least obtrusive of many possible viewpoints. Relatively  
2 few close-up views of the project have been simulated. No analysis has been provided for  
3 aesthetic impacts of the undergrounded portion of the project. While undergrounding is a  
4 preferred mitigation strategy, it is not without visual impacts.

5 **Q. Can you summarize the net result of TD&A's flawed methodology?**

6 A. The Applicant's approach fails to address the unique and fragile aesthetic  
7 character of undeveloped lands and pastoral farm landscapes of New Hampshire, and discounts  
8 the potential of relatively distant changes in the landscape to exacerbate visual impacts. Distant  
9 structures and cleared linear corridors create strong contrasts on forested hillsides especially  
10 where there are few or no other visible industrial features.

11 **Q. Can you summarize how your methodology differs from that employed in the**  
12 **TD&A VIA?**

13 A. Yes, we analyzed the project's impact on the aesthetic quality of the study area,  
14 both at the site specific and regional scale. We employed a similar methodology as the  
15 Applicant's visual impact assessment, but modified it as necessary to address scenic viewpoints  
16 that were ignored or incorrectly rated, and reflected a broader range of issues and aesthetic  
17 criteria identified in the SEC rules. We also defined "cultural value" as both official recognition  
18 as well as the effect that human intervention has had on the landscape. Please see Appendix D to  
19 my report attached as Exhibit 3 for a detailed list of revisions to TD&A's methodology and  
20 generally the substance of my report.

21 **Q. The TD&A VIA included photo simulations. In addition to reviewing,**  
22 **assessing and critiquing those simulations, did you also conduct photo simulations?**

1           A.     Yes we did and my report details the data collected, methodology, and technology  
2 utilized in creating those simulations and compares the TD&A methodology with my  
3 methodology in Appendix B to my Report attached as Exhibit 3, and my photo simulations in  
4 Appendix A to my Report attached as Exhibit 3.

5           **Q.     Are there ways the Applicants could reduce the impact on aesthetics?**

6           A.     The project's scope and scale are so extensive that available mitigation measures  
7 will be ineffective in achieving a significant reduction in aesthetic impacts. Burial of the project  
8 offers the only means of significantly reducing the project's unreasonable adverse aesthetic  
9 impacts.

10          **Q.     Does this conclude your testimony?**

11          A.     Yes it does.