

**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 The Webster Family

**What is your interest in this proceeding?**

This testimony was prepared by Heather Townsend, Maggie Mumford and Charlotte Crane on behalf of the Webster Family Group of Intervenor, which are part of the Southern Non-abutters Intervenor Group 4.

Members of our extended family own more than 200 acres on the western bank of the Pemigewasset River, in Bridgewater, New Hampshire. This property has been held by various ancestors since at least the 1780's, when Bridgewater had not yet been incorporated and the land was only beginning to be settled.

We are concerned about the adverse effects that the project known as "Northern Pass" (the Project) will have on our continued enjoyment of the property. Furthermore we are concerned that the Project will adversely affect not just our enjoyment of our land but the enjoyment of others who, consistent with the land use policies of the State of New Hampshire, use our land and similar lands along the banks of the Pemigewasset for recreation.

I believe that the representations made by the Applicant and its experts, not only in the Application but also in the pre-filed testimony supporting the application, have inappropriately omitted or downplayed the adverse impacts the Project will have on the enjoyment of this land not only by us but by the many other individuals that use these lands. This approach of the Applicant has resulted in a profound lack of information in the record before the SEC that is relevant to the determination whether the Project should be allowed to go forward.

The Applicant and its experts have omitted information about visual impacts and effects on natural resources, apparently because they believe these impacts and effects are insignificant, and despite the fact that such information is clearly necessary to allow the SEC to make a determination about the significance of these impacts. Some of the basis for the experts' conclusions that the impact will be negligible (and therefore not "unreasonable") appears to be based on the number of people who use the resources and the lack of substantial improvements at some locations. Such heavier use and such improvements would be inconsistent with the overall primitive nature of the locations and resources in question. Despite its proximity to civilization, the land along the region of the Pemigewasset we know

best is interpreted by many as effectively a wilderness, where sightings of bear, deer, eagles, herons, ospreys are possible.

We fear that the Applicant's information will not convey the true nature of this area to the SEC. Ultimately the SEC must make its own determination about whether the overall combination of these impacts and effects, when combined with all other impacts and effects and weighed against the benefits to New Hampshire, are reasonable. We hope that our contribution will assist them in making this determination.

This testimony is intended to provide a discrete example of the kinds of information that should have been presented by the Applicant, based on personal knowledge of a particular area. It is not intended to provide a complete catalog of such omissions.

### **Describe your property.**

The property, called "Webster Farms" by the family and neighbors, is composed of several tax lots that abut the River Road in Bridgewater. Several family members now own different pieces of the property that in the early nineteenth century was owned by two families both of which included descendants of Col. David Webster, who was among the first settlers in Plymouth several decades earlier.

The terrain of the combined properties greatly affects their use: the land to the west of the Pemigewasset to the River Road is primarily steep river bank, the land further west and straddling the River Road is a flat plateau with a width of about 1000 feet, and the land still further west is forested hilly and extends more than half a mile up the shoulder of Bridgewater Hill.

The combined property includes more than 2000 feet of frontage along west bank of the Pemigewasset River, from the Sawhegenet Recreation Area, maintained by the town of Bridgewater, south to the boundary of property formerly known as Cogwood Campgrounds. The shore on the northern portion of the property is only a few feet higher than the river (town maps suggest that the bank in this area is at 460 feet above sea level), but in many places further south the drop from the stable bank to the river level is as much as 20 feet. A former work road runs along this bank, but has been undercut by erosion due to the normal action of the river to such an extent that in several places it is appropriate only for foot and horseback travel.

On the plateau, the property is relatively level on both sides of the River Road at an elevation of about 560 feet above sea level. Several residences and outbuildings, as well as small gardens and playing fields, are located in this area.

The property extends to the west up the shoulders of Bridgewater Mountain, to elevations more than 800 feet above sea level. Adjoining properties also held in current use reach elevations of more than 1200 feet less than half a mile west of the River Road, and less than 2500 feet from the right-of-way proposed to be used by the Project. These elevated locations can be accessed from Cass Road, a class 6 road that bisects the property and connects the River Road with Bridgewater Hill Road.

### **How is your land used?**

For the last few decades, the family property has been primarily committed to forest. Except for the several residences and outbuildings on the property, its status is reflected by the fact that it has been accepted by the town of Bridgewater as property taxed under the current use program, with

recreational access to the public throughout the property, with the normal exception of the several house lots.

Most of the property is open in the spring, summer and fall to those approaching on foot and on horseback. It is accessible to those using the Cass Road as well as those approaching on foot from Sawhegenet or from the river in boats (canoes, kayaks and tubes). In the winter it is open not only to those on foot (or using snowshoes or cross country skis) but also to those making use of the snowmobile trails that traverse the property. (These trails are maintained by the Bridgewater Mountain Snowmobile Club for the benefit of the public.)

In recent decades, the forest land has been actively managed and harvested. Within the memory of a generation still alive, however, large portions of the land were cleared and plowed for vegetable farming. Stone walls within the currently forested areas, as much as 1000 feet from the road, indicate the likely extent of the former agricultural clearing up the more shallow slopes of the property west of what is now the River Road.

Despite the fact that for more than a century, the property was devoted to practical uses, evidence exists suggesting that it has always been valued by our family and our neighbors for its scenic qualities. The remains of a treehouse, at one point outfitted with a woodstove, running water, and a porch overlooking the river, are still visible less than 200 feet up the steep bank from the river, just below the level the plateau. This treehouse was built in 1913 by my grandmother, presumably before the time when the industrial and municipal waste rendered the river so polluted that it would not be considered much of a natural resource. (The treehouse used living trees for its support, an approach that unfortunately rendered its life no longer than the life of the trees themselves.) Routes from the public road to outcroppings with views, both on and off our properties, remain part of our common understanding of the property.

During our early childhood, the Pemigewasset River was too polluted to be considered a valuable recreational resource. However, by the time of our early adulthood, the Pemigewasset had become clean again. Children could swim at Sawhegenet or at the small beach at Cogwood Campground. We could put canoes in directly from our property. Or we could rent inner tubes or kayaks in Plymouth and float the length of the river, joining others on tubes, canoes and kayaks to enjoy the primitive scenery along almost the entire stretch of the river from Plymouth.

Before the river was clean, the land uses of riverfront property along this stretch of the Pemigewasset tended not to relate to the river, and no recreational use of the river was desirable. Roads and railroads remained near the river where they historically had been located in order to follow the most accessible route. (Indeed, from the late eighteenth century our property was originally the site of a tavern used by travelers heading north along the river.) But in the early twentieth century and continuing until late into the twentieth century, the banks of the river itself were likely to have remained undeveloped except near the centers of towns.

Only since the river has been clean has development resumed that addresses the river directly. Much of this development has been aimed at recreational uses and preserving the features of the shoreline that make this area desirable for recreation, including a golf course and associated development about four miles upstream, and two campgrounds with permanent improvements within 5 miles downstream. As the photographs taken by the Applicant's expert but not included in its report (included as attachments)

reveal, the views both upstream and downstream from our property are of entirely undeveloped and undisturbed riverbank.

**What will the effect of the completion of the Project be on your enjoyment of your property and the surrounding properties, including the Pemigewasset River?**

It is very difficult to tell from the information provided in the application and subsequent filings. Although our property abuts the land in New Hampton over which the Applicant's right-of-way passes and is less than 1500 feet away from the right-of-way itself, the analysis provided by the Applicant does not allow any reliable conclusions regarding the long-term visual impact of the Project on our land and the neighboring lands along the western bank of the Pemigewasset.

The Applicant's expert's report on the visual impact included an analysis of the impact at the water level at Sawhegenet. See Northern Pass Transmission Line Visual Impact Assessment, dated October 14, 2015 (DeWan Report) at 4-8 and 4-9. The northerly most portions of our shore has essentially the same vantage point as that used in the DeWan Report analysis. The conclusion was that there would be "limited visibility or no visibility during leaf-on conditions due to mixed vegetated buffer along the Pemigewasset River," and that "[t]here may be filtered views of the transmission structures on the eastern bank of the river during leaf-off conditions." The only attempt to analyze the visual impact was from the water level itself. The cross section used in this analysis, however, assumes that the vegetation forms a complete barrier during leaf-on conditions and a substantial barrier during leaf-off. See DeWan Report at 4-9. The likelihood that this barrier will always be complete is belied by the pictures taken by the Applicant's expert but omitted from the report. These photographs were made available in response to data requests, and are included in attachments to this testimony. These photographs show breaks in the trees along the shore. When viewed in combination with the photographs from above included in the Applicant's Proposed Route Project Map, sheet 126, and the depiction of the height of vegetation at this location prepared by the Applicant's expert but not included in its report (attached), it is clear that there is only a very sparse line of trees with a height that may be no more than 40 feet along the waterfront on the eastern bank of the river at this location. As is clear from these photographs, where the vegetation is most sparse, the vegetation includes more deciduous trees. Nevertheless, the Applicant's expert decided not to include analysis of this view under leaf-off or winter conditions, see supplement to the DeWan Report available on the Sharepoint website as Attachment 9, Leaf-off Photosimulation Revised. Nor did the Applicant's expert note the lack of other evidence of development along this stretch of the river.

The Applicant's expert also made no mention of the special nature of the site at Sawhegenet. Sawhegenet was the location of a bridge built in the mid-nineteenth century, linking the farms along the western bank of the Pemigewasset with the railroad in Ashland. Note that the photographs taken by the Applicant's expert but not included in the report clearly show the cut stone of the foundations of the bridge. Because they are the native stone, they do not detract from the otherwise entirely primitive views both down and up the river from Sawhegenet.

The cross-section also analyzed the sightline to Structure DC-1116, which is neither the tower closest to Sawhegenet nor the highest tower that may be visible. Structure DC-1114 is more than 400 feet closer, and, because it will be built at a site with an elevation of more than 494 feet above sea level and almost 20 feet higher than the site on which structure DC-1116 is to be located, will extend much higher above the tree line. Under current conditions there is more vegetation blocking the possible views of Structure

DC-1114, but again the Applicant's expert has provided no analysis of the likelihood that this vegetation, most of which is at the river level, will endure beyond the life of the structures to be included in the project.

The Applicant's expert made no attempt to assess the visual impact at any other altitude at the Sawhegenet Recreation Area, even though its report included photographs of benches that are well above the river level. Again the expert relies upon the presence of "vegetation... to screen the view of the project from the trail and benches." The expert included no analysis of the likelihood that this vegetation will remain in place throughout the life of the structures anticipated as part of the Project. The expert's report also noted that the driveway to the shore was "steep," but it did not analyze the impact from the public parking space at the beginning of that driveway, which is more than 520 feet above sea level, and more than fifty feet higher than the river.

The Applicant's expert made no attempt to evaluate the visual impact from the level of the river at any other point along this stretch of the river. This omission seems particularly inappropriate given that less than half a mile south of Sawhegenet and less than two-thirds of a mile north of a campground that focuses on the use of the river as a recreational resource, the right-of-way at Structure DC-1120 (a 95 foot structure whose base would be at an elevation at least 15 feet higher than the river) appears to come within 150 feet of the river. This structure is directly across from the cleared lands on which our immediate neighbors to the south maintain river access suitable for launching small boats.

The Applicant's expert made no attempt to evaluate the visual impact from any other elevation along the western shore of the Pemigewasset, despite the dramatic changes in elevation within half a mile of the Project, and despite the fact that this land includes several hundred acres of lands open to, and used by, the public for recreation. The dramatic nature of these changes in elevation, and the interspersing at these elevations of lands that are currently cleared (and which therefore currently afford views both to the west and to the east) with lands that are currently in forest, can readily be seen from the map provided in the report relating to the Historic Sites and Cultural Landscapes included at page 24 of Appendix 2 to the pre-filed testimony of Heritage Landscapes. (Our properties surround the pond that is visible just to the west of the most easterly border of Bridgewater.)

The Applicant failed to include any mention of the views from the residences, including the seasonal residence that was built in the decade after 1800 and other residences that are permanent residences, at the level of the River Road itself, or from the elevations in the foothills behind it in its assessment of the visual impact on private property.

Nor did the Applicant's expert consider the impact of the Project on the views from our neighbors' properties, located just off Cass Road and Bridgewater Hill Road, many of which look down into the town of Ashland and the river valley in which it lies. While these views include existing development, no attempt was made to evaluate the difference between the existing view and that which would result from the Project and the changes in the way that the right-of-way will be maintained.

**Do you have any other basis for your fears that the information provided by the Applicant in this proceeding regarding the effect of the Project on scenic and natural resources may be incomplete?**

Two family members, Margaret Mumford and Heather Townsend, received permission from Pamela Monroe to join the SEC site visit on Monday, March 16, 2016. An additional stop was requested through

Pamela Monroe and was granted by the SEC. This riverbank site off of Rte. 132 in New Hampton was acknowledged to the committee as the Rte. 93 Scenic Easement site by the applicant's representative only with prompting by the family members and minimal further discussion of the easement or its history as part of the Highway Beautification Act of 1965 or the role of PSCNH in its maintenance occurred. The committee members might recall standing adjacent to a steep bank approximately 30 ft. above the river, with a pleasant view upriver along the scenic easement- only a glimpse of the current towers in sight- and a gorgeous, uninterrupted view downriver (not officially declared scenic).

Analysis of this particular site was provided by the Applicant's expert, see DeWan Report at 4-14. In its analysis, the expert downplayed the view from the highway itself, noting that "when the interstate was constructed in the 1960's these trees may have been considerably shorter and the view of the river more expansive," and that "it appears that the easement has not been maintained to keep the view to the river open." The expert seems to acknowledge that, given the terms of the easement, the Applicant does not have control over whether this vegetation remains in place. Nor does the Applicant's expert consider whether the structures that are not immediately adjacent to the scenic easement, including Structure DC-1146 though DC-1149, will be visible from the highway or the river bank at the site of the scenic easement.

Moreover, many other such serene riverscapes exist along this restored river that were not referenced in the information provided by the Applicant. The Applicant's experts have not addressed adequately the potential water quality and aesthetic impacts of construction and maintenance proposed near this site which the SEC did view, as well as at multiple other river crossings planned by the Applicant.

The stop that family members were able to add to the site visit was not along Webster farms property, as our family had hoped for, since our river frontage is along River Road, which runs down the west side of the river, , and the bus tour went down the east side, along Rte. 132. Many people access the river for recreational use from the west side, along River Road, and thus the potential impacts from this perspective are important, though not visible to the SEC on the site visit bus tour nor, as discussed above, adequately presented in Dewan Report. Similar steep banks with natural undercuts and views with little or no evidence of human development, valued highly by residents, exist at this site as well.

Both family members noted the lack of inclusion in the bus tour of other representative beautiful landscapes which would be affected by the Project. There were no stops scheduled s along the Pemigewasset River between Ashland and the dam in Bristol, Nor were there any along Peaked Hill Road, (in New Hampton, overlooking Bristol). The applicant's experts photos of effects on Peaked Hill road, distributed on the bus, only showed the distant towers, and did not include the towers on the Hill itself (from DC-1160 to DC-1173), nor did they include recently fully cleared right-of-way along the road, bisecting otherwise gorgeous landscape. The Dewan Report does not includes photos or analysis of the these towers along Peaked Hill Road itself; .

In addition, the stop in Bridgewater, at the proposed transition site, was notable for the lack of the Applicant's acknowledgement of proximity of the six acre lot to the Pemigewasset River, within a few hundred feet and down another steep embankment.

The Applicant's information similarly has not included references to recent restoration projects in headwaters of the Pemigewasset River less than 30 miles upstream. These have involved over \$3.5 million dollars expenditure to improve quality of the waters. Though one of these, funded through the

Joint Chiefs Restoration Partnership, focused primarily on drinking water quality, their project description for the Pemigewasset headwater ( completed in 2014) notes that “A successful partnership and project will be based on improvements in water quality as documented through water testing of drinking water supplies, reductions in sedimentation, improved hydrologic function in streams, wildlife habitat improvements, and increases in working lands conservation.”

<https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/newsroom/features/?cid=stelprdb1245070>

Work by the local chapter of Trout Unlimited, funded by a 2013 Watershed Assistance Grant through Section 319 of the Clean Water Act by the U.S. Environmental Protection Agency, focused on a half mile section of the Pemigewasset River just north of Plymouth and “included stabilizing the channel and banks, plus returning the river along this reach to a state of equilibrium, which means a balance between erosion and deposition attained by mature rivers.”

<http://pemigewasset.tu.org/sites/default/files/EnvNews-2013-nov-dec-pg7.pdf> The river remains subject to nonpoint pollutants, but local, state, and national efforts to keep the watershed intact and of high recreational value have been significant, and highlight the value of the Pemigewasset River.

These aesthetic and resource values of the recently restored Pemigewasset River are not adequately considered by the Applicant’s expert, nor adequately viewed on the SEC bus site visit.

The significance of these efforts can easily be confirmed by references in public studies and reports, including those available at

<http://des.nh.gov/organization/divisions/water/wmb/rivers/documents/pemi-report.pdf>

### **Provide a summary of your testimony.**

The information made available to the SEC by the Applicant regarding the effects of the project on natural resources and aesthetics—and the recreation that depends upon it-- is incomplete.

In those assessments that were included, the Applicant’s expert relied on the continued presence of vegetation to block views of the structures involved in the Project. Its report stated that “[the existing] transmission line is separated from the river by established forestland and riparian vegetation throughout most of its length in the NPT study area. This buffer will be maintained throughout.” DeWan Report at 4-4. No analysis has been provided, however, regarding the likelihood that this vegetation will not be affected by the land use decisions that may legitimately be made by the owners of the property on which the vegetation is growing. There is no indication that the Applicant will have any ability to influence on the decisions of these landowners, whose ability to clear this vegetation is limited only by standards designed to prevent erosion, not to obstruct views from or to the river. Nor does the Applicant’s expert take into account the vagaries of the river that could lead to erosion and loss of tree cover, or the life expectancy of the vegetation itself. Perhaps more importantly, the Applicant’s expert, in concluding that “the new structures will have a minor effect on the experience of being on the river and should not result in a substantial change in the way people now use of enjoy the Pemigewasset” failed to take into account the fact that for substantial lengths of the river near our properties, its structures are the only structures that are visible along the otherwise totally undeveloped riverbank.

Many other locations, uses, and effects along the part of the Pemigewasset with which we are most familiar were entirely overlooked by the Applicant and its experts.

**Provide sources from which the SEC might learn more about the location and resources discussed in this testimony:**

National Accomplishments in Pollution Control, 1970-1980: Some Case Histories January 1, 1980, U.S. Environmental Protection Agency, Office of Planning and Management, Program Evaluation Division

“National Water Quality Inventory: 1976 Report to Congress”

<https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=9100ZA3E.txt>

[https://iaspub.epa.gov/tmdl\\_waters10/attains\\_waterbody.control?p\\_list\\_id=NHRIV700010801-22&p\\_cycle=2012&p\\_state=NH&p\\_report\\_type=T](https://iaspub.epa.gov/tmdl_waters10/attains_waterbody.control?p_list_id=NHRIV700010801-22&p_cycle=2012&p_state=NH&p_report_type=T)

December 30, 2016

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

Dear Site Evaluation Committee:

I am writing this letter to inform the SEC of my opposition to the Northern Pass project and to explain the significant impact this project will have on my business due to aesthetic, construction and financial issues. I am a retail sports shop owner in Plymouth and have been since 12.10.1995. A significant portion of my summertime business is based upon kayak, canoe and tubing trips down the Pemigewasset River. Customers prefer a route from Plymouth downriver to New Hampton rather than the northern route coming to Plymouth because of the volume of water that this river carries due the merger with the Baker River, and also the lack of development and the highly scenic experience on the southern route.

If Northern Pass towers and wider cuts within the right of way are completed, they will mar the natural appearance and views, and definitely my rental business will suffer. Other recreational users will also experience the loss of a peaceful, natural experience along a scenic river.

My retail store is on the northern edge of the town common on Main St in Plymouth. I anticipate that the disruption during construction should the Northern Pass project be approved will disrupt my business in general and, if during the summer, the rentals in particular, as I currently can store and display my boats in a high- traffic but easily monitored site. I will lose use of this site during construction. And how will my customers enjoy the experience of machinery fouling the water with sand from the banks and disrupting the tranquility as towers go up?

The construction at any time of year would certainly directly disrupt store customer traffic as it happened when the Main St Revitalization project took place in the summer of 1998, putting a number of stores out of business and others on the brink of collapse. It took 10 years for my store to financially recover.

I am concerned for the viability of my business with the current proposal of underground line along Main St. and overhead lines crisscrossing the Pemigewasset River from Ashland through New Hampton. A decrease in river aesthetics will have economic consequences for my business, and disruption in Plymouth will be a significant burden placed unfairly upon me and other businessmen like me.

Sincerely,

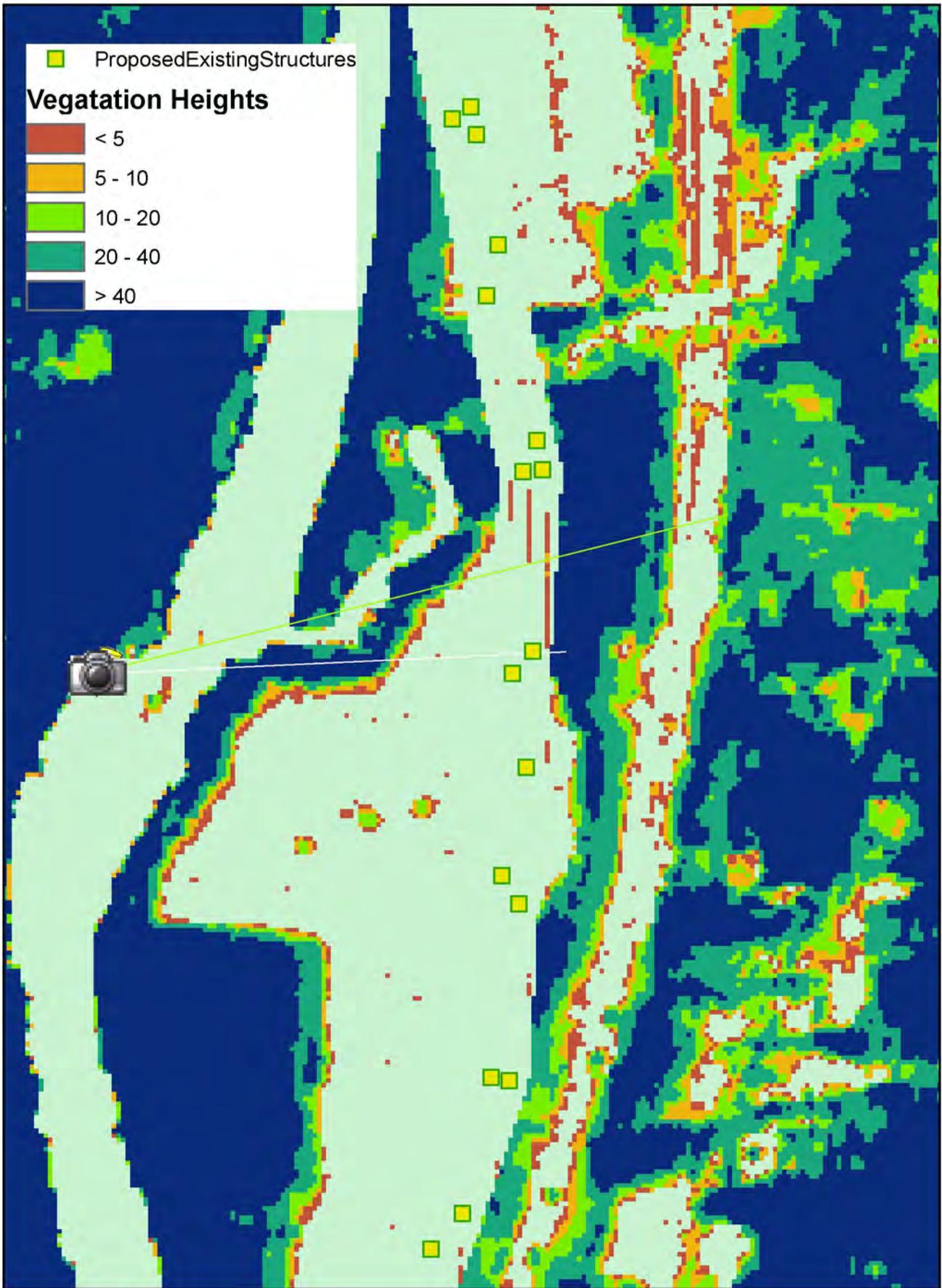
Daniel Masera  
Plymouth Ski & Sports, Inc













# NH Historic Sites & Cultural Landscapes

Client: State of NH  
Counsel for the Public

Heritage Landscapes LLC  
Preservation Planning &  
Landscape Architecture

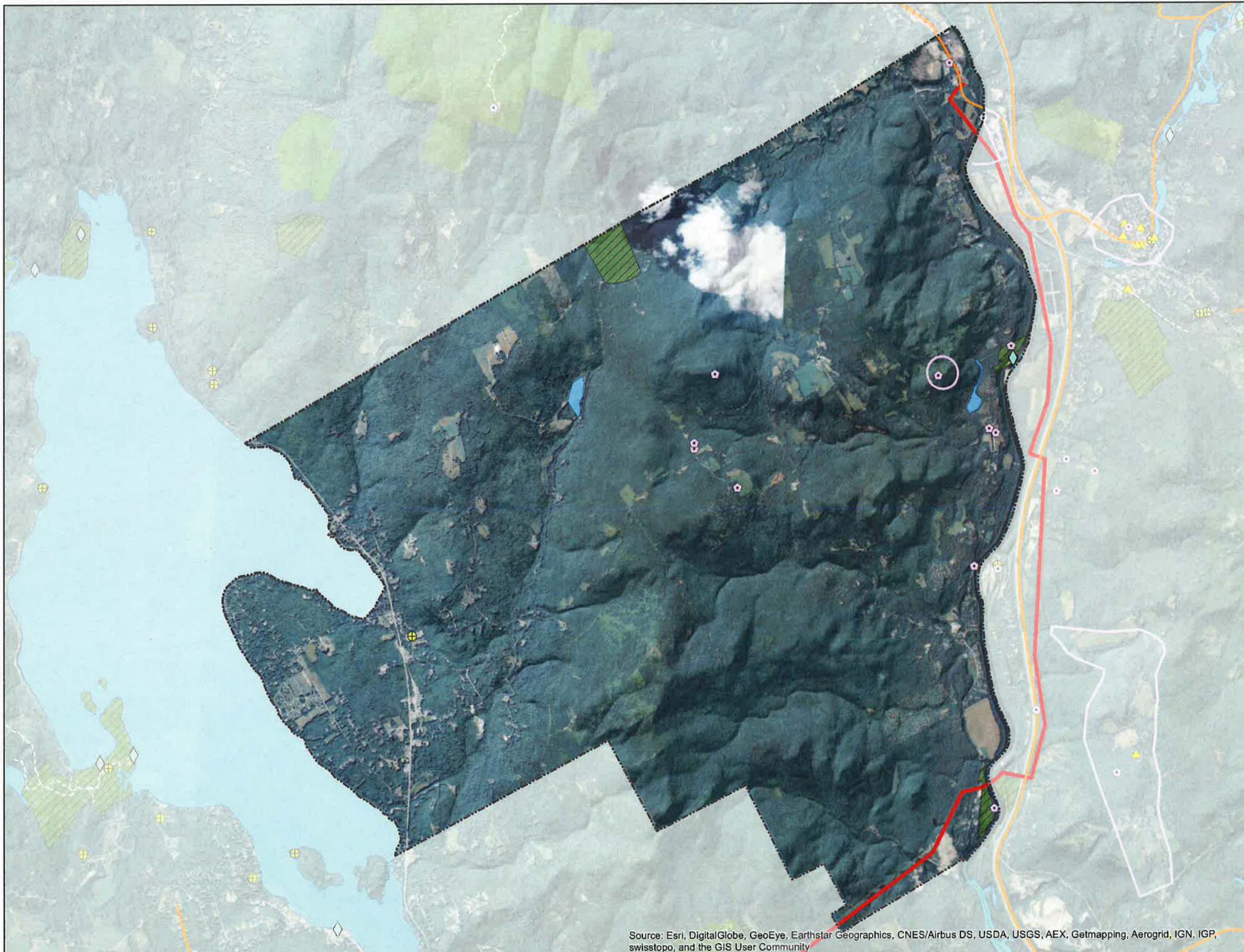
## Town Level Agglomerated Data

Dwg: **Bridgewater**

Date: 15 Nov. 2016

### Map Key

-  National Register Listed/  
Determined Eligible
-  Historic Graveyard
-  Unlisted Historic Resource  
Identified in State GNIS Data
  
-  Conserved/Public land
  
-  Recreation Site
-  Recreation Area
-  Overlook
  
-  Scenic Road
  
-  Trail
-  Trail point
  
-  Public Waters
-  Public Water Access
-  NH Designated River
  
-  Community Identified  
Historic Site
-  Community Identified  
Linear Historic Site
-  Community Identified  
Historic Area
  
- Proposed NP Centerline**
-  Above ground
-  Under ground
-  Town boundary



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

