

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

SUPPLEMENTAL  
PRE-FILED DIRECT TESTIMONY OF HARRY DODSON  
ON BEHALF OF THE SOCIETY FOR THE PROTECTION OF  
NEW HAMPSHIRE FORESTS

APRIL 17, 2017

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

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

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

4           A:     Dodson & Flinker, Inc.

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

6           A:     Principal.

7           **Q:     What is the purpose of your supplemental testimony?**

8           A:     The purpose of my supplemental testimony is to provide additional information to  
9 further explain the methodology in my report submitted with my original prefiled testimony,  
10 submit a few replacements pages to the report where we discovered some errors, and to provide  
11 my professional comment after review of the testimony and reports filed by Counsel for the  
12 Public's experts, T.J. Boyle and Patricia O'Donnell.

13           **Q:     What further information are you providing with respect to the methodology**  
14 **used in your report?**

15           A:     Please see the Excel Spreadsheet Dodson & Flinker Evaluation Worksheet in  
16 protected and unprotected formats attached as Exhibit 1.

17           This Microsoft Excel spreadsheet was used to tabulate scores for scenic significance,  
18 aesthetic impacts, and overall visual impact according to the methodology described in Appendix  
19 D "Detailed Dodson & Flinker Methodology" to my Visual Impact Assessment Northern Pass  
20 Transmission Project submitted with my Prefiled Testimony as Exhibit 3. The spreadsheet is  
21 organized with scenic resources in rows and descriptive and scoring information in columns.  
22 This spreadsheet includes all of the evaluated scenic resources that appear within the Dodson &

1 Flinker (D&F) Visual Impact Assessment. The first column (**Column A**) includes the names of  
2 scenic resources. Some scenic resources were previously simulated and evaluated by Terrence J.  
3 Dewan & Associates and subsequently re-evaluated by D&F. These sites are noted in  
4 parentheses: “(TD&A).” Other TD&A scenic resources were re-evaluated *and simulated* by  
5 Dodson & Flinker, Inc. These are noted “(TD&A and D&F).” Additional sites that were  
6 simulated and evaluated by Dodson & Flinker only are noted “(D&F).”

7 **Columns B through G** in this spreadsheet (with a white background) include descriptive  
8 information about each scenic resource. The applicable Log ID # assigned to visited sites during  
9 fieldwork by D&F are included in Column B. A list of all visited sites, ordered by their Log ID  
10 #s, can be found in Appendix E of the D&F VIA.

11 **Columns H through O** contain a summary of *scores* and *verbal equivalent ratings* for  
12 cultural value (pink), visual quality (gold), scenic significance (green), aesthetic impacts (lighter  
13 blue), and overall visual impacts (darker blue). The numbers and verbal descriptions in these  
14 columns were produced automatically using formulas that can be found by highlighting  
15 individual cells. In this summary area of the spreadsheet, many cells reference columns further  
16 in the spreadsheet where more detailed calculations were performed.

17 **Columns P through X** (light tan) contain ratings assigned according to the criteria found  
18 within the Aesthetic Quality Evaluation Chart, Appendix D - Figure 1. These scores are  
19 combined using a *rounded average* in **Column Y** to determine the Visual Quality Score. If/then  
20 statements within the Visual Quality formula in Column Y were included for those categories  
21 where a rating of 0 (absent/not noticeable) was possible: water bodies and human development.  
22 The if/then statements were written so that “0” ratings were *automatically excluded* from the

1 rounded average. **Column Z** converts the weighted average from Column Y (1 - low, 2-medium,  
2 3-high) to (1-low, 3-medium, 5-high). This step is necessary in order to combine the Visual  
3 Quality scores with Cultural Value scores as shown in Appendix D - Figure 2.

4 **Columns AA through AD** (light blue) contain ratings assigned according to criteria  
5 found in the Aesthetic Impacts Evaluation Chart, Appendix D - Figure 3. **Column AE** contains  
6 a *rounded average* of Columns AA through AD.

7 **Column AF** contains an Overall Visual Impact Score, which combines Aesthetic Impacts  
8 with Scenic Significance scores as shown in Appendix D- Figure 4: D&F Visual Impact  
9 Evaluation chart.

10 **Q: Did you review the T.J. Boyle's assessment of the Applicant's Visual Impact**  
11 **Assessment submitted by DeWan Associates?**

12 A: Yes, I did, and I found a noteworthy conclusion of the T.J. Boyle review  
13 determines that more than 18,000 potential visual resources within the projects area of potential  
14 visual impact should be further evaluated. These visual resources include:

- 15 • designated scenic resources
- 16 • conservation lands or easements
- 17 • waterbodies
- 18 • scenic drives
- 19 • other tourist destinations
- 20 • recreation trails
- 21 • parks and other recreation areas
- 22 • historic sites

- 1       • town and village centers
- 2       • community identified resources

3           This is a much larger quantity than the 680 resources identified in the DeWan &  
4 Associates VIA. The T.J. Boyle report states that DeWan & Associates' methods were found to  
5 be flawed and inconsistent with SEC requirements. T.J. Boyle used two separate methods to  
6 identify potential scenic resources: identification through existing data bases and nomination of  
7 scenic resources through a series of community workshops organized by the SEC. A complete  
8 list of identified scenic resources is provided in Appendix D of their report.

9           **Q: Does this conclusion in the T.J. Boyle report further inform your opinion on**  
10 **the aesthetic impacts the Northern Pass project would have on the New Hampshire scenic**  
11 **landscape?**

12          A: The T.J. Boyle analysis of potential visual resources confirms the conclusions of  
13 our VIA relating to the wide extent of the Project's viewshed and the fact that many of the views  
14 of the project occur across a wide area. Our report maintains that the DeWan & Associates VIA  
15 downplayed the significance of the large areas impacted by the Project as demonstrated in the  
16 viewshed maps. Using bare ground viewsheds as T.J. Boyle did increases the areas that will  
17 have visibility of the Project. We also stated in our VIA that since a significant proportion of  
18 views of the Project occur along linear features such as roads or over wide areas such as lakes,  
19 views will not be limited to one key observation point but will be made up of a wide range of  
20 multiple views from a variety of angles and locations. The very large number of potential scenic  
21 resources identified by T.J. Boyle confirms my conclusion that DeWan & Associates greatly  
22 underestimated the sweeping extent of the Project's visibility and impacts on scenic resources.

1 Overall, the T.J. Boyle work reinforces my opinion that this Project—as proposed—would have  
2 an unreasonable adverse impact on aesthetics across New Hampshire.

3 **Q: Did you review Patricia O'Donnell's assessment of the potential effects to**  
4 **aboveground historic sites and cultural landscapes from the Northern Pass Project?**

5 A: Yes, Patricia O'Donnell, principal of Heritage Landscapes, makes a strong  
6 connection between historic and cultural resources and scenic quality. Her pre-filed direct  
7 testimony states that “the aesthetic quality of widespread historic sites and cultural landscapes  
8 sited along the Project corridor will be diminished by direct views of the Project as well as  
9 multiple views of the Project's components”. She determines that the extent of visual impacts  
10 “would make the Project's influence pervasive and unavoidable” and that the Project's effects on  
11 historic and cultural landscape resources would be unreasonable and adverse.

12 The Heritage Landscape report emphasizes Site 102.45 which states that scenic resources  
13 include “historic sites that possess a scenic quality”. It also states that “All 30 of the major  
14 historic themes for evaluating significance for the National Register have a visual component as  
15 listed in National Register 15...”

16 These strong links between historic resources and visual quality underline the major role  
17 that historic sites and cultural landscapes play in determining the aesthetic quality of New  
18 Hampshire scenery. Therefore the extensive unreasonable adverse impacts that the Heritage  
19 Landscapes report determines that the Project will cause to historic and cultural resources will  
20 also impact the scenic character of the landscape.

21 The DeWan & Associates VIA downplays the importance of historic and cultural  
22 landscapes in creating visual quality. This results in unrealistically low visual impact ratings for

1 many landscapes with cultural elements such as farmland and historic structures. An emphasis  
2 in officially recognized historic and cultural landscapes in the DeWan VIA overlooks the  
3 important role that vernacular historic landscapes play in creating high aesthetic quality.

4 This deficiency is highlighted by the Heritage Landscapes report and the prefiled  
5 testimony of Patricia O'Donnell. In her testimony she states that "the aesthetic quality of  
6 widespread historic sites and cultural landscapes sited along the Project corridor will be  
7 diminished by direct views of the Project as well as multiple views of the Project's components  
8 when arriving at and departing from valued historic sites and cultural landscapes". This  
9 emphasizes the strong link between visual and historic/cultural factors. The major impacts that  
10 the Project will cause to historic and cultural landscapes will have a parallel high impact on  
11 visual resources. In the conclusion of her testimony she states that "The Project would, in my  
12 opinion, permanently and significantly diminish the integrity of historic sites and cultural  
13 landscapes and the aesthetic quality and character of communities, rendering unreasonable  
14 adverse effects".

15 **Q: Do you agree with that conclusion in Ms. O'Donnell's report?**

16 A: Yes. Ms O'Donnell's report confirms the assertion in my VIA that historic and  
17 cultural factors play a major role in creating scenic quality. Her report also criticizes the DeWan  
18 & Associates VIA for downplaying the role of cultural landscapes and for greatly  
19 underestimating the number of historic and cultural resources that will be impacted by the  
20 project.

21 **Q: Is there a particular effect that can increase the visual impact of a project**  
22 **such as this?**

1           A:     Yes, the visual impact of the Project is increased when structures are skylighted or  
2 viewed against a backdrop of the sky. The DeWan & Associates simulations tended to  
3 downplay the effects of skylighting. The following is an analysis of skylighting in the visual  
4 simulations prepared by each visual expert:

- 5           • DeWan & Associates: 31 simulations, 9 skylighted: 37%
- 6           • Dodson & Flinker: 19 simulations, 17 skylighted: 89%
- 7           • T.J. Boyle (DOE): 33 simulations, 15 skylighted: 45%
- 8           • T.J. Boyle (CFP): 24 simulations, 15 skylighted: 62%

9           **Q.     Why are you submitting a few revised pages to your report with this**  
10           **Supplemental Testimony?**

11          A:     Subsequent to the submission of our VIA in late December, 2016 we found a few  
12 sections of our report where we had made changes in the narrative but then did not make  
13 corresponding changes in the tables. These inconsistencies were corrected. We also found a few  
14 pages with errors. The corrected pages are included as Exhibit 2 and should replace those  
15 specific pages filed in our original report.

16          **Q:     Does this conclude your testimony?**

17          A.     Yes it does.