

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

Supplemental Pre-filed Testimony of Gretchen Draper
On Behalf of the
Pemigewasset River Local Advisory Committee

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

2. A. Gretchen Draper. 423 Blake Hill Road, New Hampton, New Hampshire.

3. Q. **What group do you represent in the SEC hearing?**

4. A. I am part of the Pemigewasset River Local Advisory Committee (PRLAC) Intervenor.
5. PRLAC is a volunteer citizen group organized under the NH River Management
6. and Protection Program (RSA 483). When the Pemigewasset became a "Designated River"
7. in 1991, PRLAC was formed to fulfill duties as outlined in RSA 483:8-a.

8. Each Local Advisory Committee develops and implements a River Management
9. Plan (RSA 483:10). I volunteered to help with the organization, writing and editing of
10. the PRLAC Management Plan in 2013. For the SEC Intervenor process Docket No.
11. 2015-16, I again volunteered to help organize, write, edit and testify on behalf of PRLAC.

12. Q. **What is the purpose of your supplemental testimony?**

13. A. On March 1, 2017, NH Department of Environmental Services announced its decision
14. to recommend approval -- with conditions -- to the permits submitted by the Applicant in
15. this docket. The permits cover wetlands, alteration of terrain, 401 Water Quality
16. Certificate and Shoreland Protection.

17. PRLAC, who is under the administration of NH DES, disagrees with the agency's
18. decision. We believe it is premature to recommend approval, even with the
19. accompanying conditions. The aim of my supplemental testimony is to further document
20. to the SEC specific adverse impacts of the construction and presence of Northern Pass
21. Transmission Lines to the Pemigewasset River watershed and river corridor communities.

22. Q. **What is the basis of your objection to the NH DES decision of March 1, 2017?**

23. A. I have lived in New Hampton for 40 years, just over a mile up the mountain from the
24. Pemigewasset River and floodplain along Coolidge Woods Rd. My husband Barry Draper,
25. an Intervenor with PRLAC, has served on New Hampton's Zoning Board and now as a
26. New Hampton representative for PRLAC. As I mentioned earlier, I also volunteer for
27. PRLAC during special projects.

28. PRLAC members live in eight river corridor communities. When there is a river-related
29. issue such as flooding or permit applications or complaints about shoreland erosion,
30. PRLAC often gets the call. The Lakes Region Planning Commission may request a site
31. visit and report back. NH DES mails the chairman permit applications for formal review,
32. comments and recommendations.

33. We also hear concerns from river town officials, neighbors, business owners and other
34. town boards or commissions. At the present time, we are working with the Ashland
35. Conservation Commission on river-related issues.

36. PRLAC is a "boots-on-the-ground" organization. This means site visits by canoe and
37. kayak, interviewing applicants and walking their sites, and carrying out annual water
38. testing under VRAP training.

39. Over the past six years, PRLAC has communicated its concerns about the Northern Pass
40. Project to NH DES by mail, email, telephone and conversations at conferences. We are in
41. attendance at public hearings and now, Intervenor in the SEC process.

42. In our review of the NH DES approval -- with conditions -- we see no evidence that
43. the agency included research, testimony or recommendations of qualified experts
44. presented to the SEC, other than the Applicant's consultants, Normandeau Associates.

45. We expected more specified stipulations and conditions given the extent of
46. construction and the permanent presence of towers and infrastructure within
47. Shoreland Protection areas.

48. We expected more rigor from NH DES in their review of this project which has been
49. designated a "Major Project" (NH Administrative Rule Env-Wt 303.02(c))
50. due to the size of wetland impacts ("greater than 20,000 feet" -page 8 of DES final decision).

51. Q. **What new information do you bring to your testimony that relates to PRLAC's**
52. **legal mandate -- and to your objections to the NH DES decision?**

53. A. Since my initial Pre-file Testimony was submitted to the SEC on November 15, 2016, I
54. have regularly attended Technical Sessions and participated in the exchange of
55. information. PRLAC has begun a monthly update on the project for river corridor towns.

56. Q. **What specific concerns would you highlight at this point in the proceedings?**

57. A. **What the Application identifies as “temporary” impacts on wetlands will in fact**
58. **become “permanent” because of construction activities and alteration of habitat.**

59. -Prefile testimonies and appearance of Rick Van de Poll for the City of Concord.

60. -Prefile testimonies and appearances of Arrowwood Environmental for CFP.

61. -Prefile testimonies and appearance of Raymond Lobdell for SPNHF

62. **Concern that the NH DES decision was premature and based upon incomplete**
63. **and outdated information.**

64. -NH DES Final Decision dated March 1, 2017

65. -Prefile testimony (12/30/16) and appearance (3/16/17) of Rick Van de Poll for the
66. City of Concord.

67. -Prefile testimonies (12/30/16) and appearances of Arrowwood Environmental for
68. Council for the Public (3/17/17).

69. -Prefile testimony (12/30/16) and appearance (3/17/17) of Raymond Lobdell for
70. Society for Protection of New Hampshire Forests.

71. **Concerns for adequate Restoration Plans proposed by the Applicant.**

72. -NH DES waiver granted that allows the Applicant to forego photograph evidence
73. of specific wetlands (NH DES 3/1/17 Decision) required under Rule Wnv-Wt
74. 501.02(a)(3) and Rule Env-Wt 501(i).

75. -Lack of evidence that photographs of impacted wetlands will document Before-
76. During- and Post Construction Impacts. Seems counterproductive to effective
77. restoration of wetlands, staging areas, lay-downs and other aspects of NPT without
78. a visual baseline and photographs of ongoing work and “finished” sites.

79. -Prefile testimony and appearances of Raymond Lobdell for SPNHF.

80. -NH DES 3/1/17 Decision. Conditions and stipulations are reliant solely on
81. Normandeau Associates reports with data from October 2015.

82. This is *not* a collaborative approach to a complex project with the potential for
83. significant unexpected and adverse consequences.

84. **Concerns for post-construction issues (i.e. ATV use due to widened ROWs) that**
85. **will be transferred to landowners.**

86. Q. **What have you learned from PRLAC meetings and river towns' comments that has**
87. **relevance to the Northern Pass Transmission Lines?**

88. A. The Pemigewasset Watershed is the focus of upcoming research. Joe Boyer, Director of
89. the Center for Environment at Plymouth State University (Plymouth, NH) spoke to
90. PRLAC on November 29, 2016 about the development of a research center for graduate
91. students. The Center for the Environment plans to cover multi-disciplinary topics:
92. *Reliance and Adaptation to Climate Change; River and Lake Management; and*
93. *Ecosystem Service Approaches (value of the ecosystem on tourism, aesthetics, viewsheds*
94. *and the ecological economy.* The program will look at the full Pemigewasset Watershed
95. and create "Big Data" for use in creating and refining regulations and decision-making
96. that engages local town, business and environmental groups.

97. -Dave Jeffers of Lakes Region Planning Commission oversees grants to help
98. towns develop Groundwater Protection programs. He has worked with PRLAC member
99. towns Bristol and New Hampton. One of the areas of great interest is *Aquifer Protection*.
100. *This is of particular concern for the town of Ashland, NH.*

101. -At the same 11/29/16 meeting, PRLAC members from New Hampton and Holderness
102. reported on a presentation at PSU with the Pessamit Innu Tribal Chiefs from far Eastern
103. Quebec. The Pessamit live where Hydro-Quebec has been granted "indefensible
104. privilege" by the Quebec government to manage the Betsiamites River in a variety of
105. hydro-electric projects -- including the Northern Pass link into New England. *PRLAC*
106. *members came away from this presentation highly skeptical of the Applicant's claim of*
107. *"green, clean energy". Hydro-Quebec's water practices have already destroyed salmon*
108. *stocks and conditions necessary for successful breeding and fry survival.*

109. -PRLAC has received formal requests for input regarding NPT's route and impacts:

110. -*Friends of the Pemigewasset - Livermore Falls* (see attached letter)

111. -*Ashland Conservation Commission.* See Supplementary Testimony of PRLAC
112. Chairman Max Stamp

113. -*Pemi Pathway and Bristol Falls Park permit under review, Town of Bristol.*

1. Q. **In conclusion, based upon your background, research and participation in the**
2. **SEC process, do you continue to oppose the Northern Pass Project?**

3. A. Yes.

4. I urge the SEC to deny this Application. My concerns fall in the following areas:

5. -interference with the orderly development of the Pemigewasset River region.

6. -unreasonable adverse effects on aesthetics, historic sites, water quality, the natural
7. environment and public health and safety.

8. This project does not serve the public interest. It places undue burdens on the
9. people of New Hampshire and the entire region economically, culturally,

10. socially and politically. It assaults the New Hampshire rural character and

11. sense of place and community. Northern Pass Transmissions Lines, LLC was

12. *not* created with the people of New Hampshire in mind.

Respectfully submitted,

Gretchen D. Draper

Intervenor, Pemigewasset River Local Advisory Committee

April 17, 2017