

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

SEC DOCKET NO. 2015-06

**JOINT APPLICATION OF NORTHERN PASS TRANSMISSION LLC &
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE
D/B/A EVERSOURCE ENERGY
FOR A CERTIFICATE OF SITE AND FACILITY**

**SUPPLEMENTAL PRE-FILED DIRECT TESTIMONY OF
MAX STAMP, CHAIRMAN
PEMIGEWASSET RIVER LOCAL ADVISORY COMMITTEE**

APRIL 17, 2017

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

2. **A.** Max Stamp, 2110 Summer St. Bristol, New Hampshire 03222.

3. **Q. What organization do you represent in this SEC hearing.**

4. **A.** I am Chairman of the Pemigewasset River Local Advisory Committee (PRLAC).

5. PRLAC is a volunteer citizen group organized under NH River Management and
6. Protection Program (RSA 483). When the Pemigewasset became a "Designated River" in
7. 1991, PRLAC was formed to fulfill duties as outlined in RSA 483:8-a. Each Local
8. Advisory Committee develops and implements a River Management Plan (RSA 483:10).
9. LACs are under the administration of NH DES.

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

11. **A.** The purpose of my supplemental testimony is to present our concerns to the SEC
12. raised by the March 1, 2017 decision of New Hampshire Department of Environmental
13. Services to recommend approval of the Application with conditions. PRLAC, with
14. due respect, disagrees with the timing and content of this decision. We believe NH DES is
15. premature in its permitting, even with the accompanying conditions.

16. **Q. What specific issues or concerns would you like to address to the SEC and DES?**

17. **A.** May 9, 2016, PRLAC sent an “Issues” letter to NH DES outlining our questions and
18. concerns for the proposed Northern Pass Transmission Lines project. We stated our
19. opposition to the route and proximity to the Pemigewasset River, concerns over
20. construction impacts to the watershed, and overall questions about cutting mature
21. trees and changing wetland functions that have wide implications for the watershed.

22. PLAC also pointed out several significant bank destabilization and erosion conditions
23. then existing at PSNH/Eversource ROW crossovers on the Pemigewasset River and some
24. tributary streams. These conditions would not meet SWQPA standards --New Hampshire
25. Shoreland_Water_Quality Protection Act.

26. We provided photographs of the damage. PRLAC made specific recommendations.
27. We did expect support from NH DES in correcting these problems.

28. However, NH DES did not address these issues in their Applicant approval letter.
29. Our May 2016 letter had been forwarded by DES to Normandeau Associates for
30. their response. Normandeau offered general reassurances to what we considered
31. specific problems. The commonly used phrases included: “to the extent practicable”,
32. “minimize potential impacts through compliance with Best Management Practices”, and
33. “tree cutting will be conducted to comply with SWQPA requirements wherever possible”.

34. In general, and there are some exceptions, the feedback from both groups read like
35. standard “boiler plate” statements typical of very large scale projects.

36. PRLAC continues to ask for a permanent fix for ROW river crossover problems.

37. **Q. What other issues or concerns have come to PRLAC's attention since your initial**
38. **Prefile Direct Testimony was submitted to the SEC on November, 15, 2016?**

39. **A.** ROW construction activity along Ashland’s riverfront presents some uniquely serious
40. problems for the Pemigewasset River and for the town. These concerns were recently
41. expressed during meetings with Ashland’s Conservation Commission and PRLAC.

42. Ashland is a river corridor town with an active PRLAC representative. In our reviews
43. of the project's impacts on the river, Ashland's riverfront exposure to NPT ROW high risk
44. construction and construction preparation makes this riverfront an extremely high
45. priority Pemigewasset water quality issue.

46. The overriding concerns are well-expressed in an April 13, 2017 letter to PRLAC from
47. the Ashland Conservation Commission. See attached letter in Appendix 1.

48. **What are the special concerns for Ashland?**

49. Ashland's Water & Sewer facility occupies a lengthy river front area. It's large open
50. sewage lagoons (4) occupy a long strip of low land through the area identified by NHDES
51. Wetlands maps (sheet numbers 472, 473, 474, 475). The cumulative impoundment area
52. of the treatment lagoons is designated as a dam by NH DES. Any breach of this
53. impoundment could result in the discharge of untreated effluent, as hazardous waste,
54. into the Pemigewasset River or the Squam River, both of which are in close proximity to
55. the municipal wastewater treatment facility. The 100 year flood plain abuts and actually
56. encroaches on the ROW through this critical section. The ROW occupies the narrow strip
57. of land between the river and the settling ponds. The distance between the river
58. reference line and the closest lagoons ranges from 250-320'.

59. (a.) It is apparent from these maps that there will be extensive tree cutting in the
60. narrow protective buffer between the river and the lagoons. This will be necessary
61. to clear this section of the ROW for 5 new lattice towers. The new towers are to be
62. located near the ROW boundary closest to the river which magnifies the buffer
63. damage. It appears the damaging tree cutting would all but eliminate the protective
64. tree lined buffer in key sections of the lagoon area.

65. (b.) Ashland is blessed with a "high potential" riparian aquifer for approximately
66. 1.5 - 2 miles along its river border. The NPT ROW runs on top of this aquifer for

67. most of that distance. Heavy machinery traffic; tower excavations, and possible
68. blasting are serious concerns. This ROW traffic continues right through Ashland's
69. town wellhead area which is under "sanitary protection". This is the town's only
70. source of municipal water. Multiple monitoring wells are also located in this area.

71. (c.) This entire section of ROW introduces additional concerns. Buried solid waste and
72. contaminated soils are known to exist from the construction of Interstate 93 and the
73. relocation of the B & M Railroad ROW and may be uncovered or destabilized during
74. construction of the project. In addition to drilling and possible blasting – this area is
75. likely to see construction of crane pads, staging and material lay-down areas.

76. (d.) What consideration was given to avoiding new structure construction through this
77. highly sensitive area? This is an area of the river where we would have expected more
78. scrutiny and challenges from NH DES.

79. As stated at the top, this section of ROW presents uniquely serious problems, not only
80. for the Pemigewasset and Squam Rivers, but for the town of Ashland. These issues alone
81. give the SEC reason to deny NPT permitting.

Respectfully submitted,

Max Stamp, Chairman

Pemigewasset River Local Advisory Committee

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APPENDIX 1