

ATTACHMENT A

STATE OF NEW HAMPSHIRE
BEFORE THE SITE EVALUATION COMMITTEE

Docket No. SEC 2015-02

In Re: ANTRIM WIND ENERGY, LLC
CERTIFICATE OF SITE AND FACILITY

PRE-FILED DIRECT TESTIMONY OF DANA VALLEAU ON BEHALF OF ANTRIM
WIND ENERGY, LLC

January 10, 2019

1 **Qualifications of Dana Valleau**

2 **Q. Please state your name, title and business address.**

3 A: My name is Dana Valleau. I am employed by TRC Environmental Corporation
4 (“TRC”) as an Environmental Specialist. My business address is 14 Gabriel Drive, Augusta,
5 Maine 04330.

6 **Q. Briefly summarize your educational background and work experience.**

7 A: I have a B.S. Degree in Wildlife Management from the University of Maine and a
8 Juris Doctorate also from the University of Maine. I have worked in the environmental science
9 field for over 20 years in a wide variety of capacities. I was certified as wildlife biologist in June
10 2011 through The Wildlife Society, a nationally recognized certification program for
11 professional wildlife biologists, and have been certified as a Professional Wetland Scientist since
12 May 2005 by the Society of Wetland Scientists, an international organization dedicated to
13 fostering sound wetland science, education and management. I have conducted/coordinated
14 wetland and vernal pool surveys and assessments on electric transmission line projects such as
15 the Central Maine Power Company Maine Power Reliability Project and also on the Kibby and
16 the Kibby Expansion Wind Power Projects in Maine.

17 Additional detail regarding my education, background and experience is contained in my
18 curriculum vitae which is attached hereto as Attachment DV-1.

19 **Q. Please describe your involvement with the Antrim Wind Project?**

20 A. I presented testimony on the results of bat field studies, as well as testimony
21 regarding the potential effect of the Antrim Wind Project on the natural environment, particularly
22 wetlands, vernal pools, and wildlife habitat, in connection with Antrim Wind Energy, LLC’s

1 (“AWE”) application for a certificate of site and facility in Docket 2012-01 as well as in Docket
2 2015-02. Specifically, TRC was responsible for identifying and mapping all wetlands within the
3 Project area and potential impacts to wetlands associated with the Project. I have worked as a
4 consultant with representatives from Antrim Wind Energy and Eversource to determine the
5 scope of temporary wetlands impacts from installing an electric tap on the existing transmission
6 line. I have also prepared the Wetlands Permit Application for submittal to the New Hampshire
7 Department of Environmental Services (“NHDES”) in order to permit the temporary wetland
8 impacts.

9 **Q. What is the purpose of this pre-filed testimony?**

10 A. I am submitting this testimony in support of a motion by Antrim Wind Energy,
11 LLC to amend its Certificate of Site and Facility to reflect an increase in the facility’s temporary
12 wetland impacts from 60 square feet to 10,060 square feet. My testimony describes the
13 additional temporary impacts and supports the conclusion that the additional impacts will not
14 undermine the Committee’s initial findings regarding the natural environment and water quality.

15 **Q. Please describe the original wetlands impacts associated with the Project and**
16 **particularly associated with interconnection of the Project to the PSNH substation.**

17 A. The overall original wetland and waterbody impacts permitted for the project are
18 small due a project design focus on avoiding and minimizing wetland and waterbody impacts.
19 Total wetland impacts as originally permitted totaled 9,277 square feet. The original design to
20 support the electric tap contemplated several structures and guy anchors in wetland AN31, as
21 shown on engineering plans and those impacts are already permitted. In order to install the final
22 tap structure design Eversource has identified the need to use timber mats (also referred to as

1 swamp, crane, or construction mats) for access and construction workspace. The use of timber
2 mats will protect the wetland area within the workspace from rutting and disturbance. The use of
3 heavy machinery in wetlands without mats can also be difficult and create unsafe work
4 conditions. Timber mats provide for a stable level travel and work space. The addition of
5 temporary timber mats is the only change to the wetland impact originally permitted.

6 **Q. Please describe the new temporary wetlands impacts associated with the use**
7 **of timber matting during the PSNH interconnection process.**

8 A. Impacts to wetlands associated with the use of temporary timber mats may
9 include removal of vegetation above the ground level, soil disturbance, and soil compaction.
10 Mats are used to maintain the soil structure and vegetation root and seed stock and revegetation
11 will typically occur rapidly. As mats are removed, any soil that is disturbed or compacted is
12 restored to pre-construction condition and elevation and will be seeded with a native wetland
13 seed mix. The restored wetland area will function the same as it did prior to the temporary
14 impacts.

15 **Q. Are you familiar with the findings made by the Site Evaluation Committee with**
16 **respect to the Antrim Wind Project's impacts on the natural environment and water**
17 **quality?**

18 A. Yes. I am familiar with the Committee's Decision and findings on these issues.

19 **Q. Do you believe that the additional temporary wetlands impacts undermine**
20 **the initial findings of the Committee?**

21 A. No. The temporary impacts from the use of timber mats will not result in a net
22 change in Project impacts as the areas where they will be used will be restored once the mats are

1 removed. NHDES also considers this amount of temporary impact to be a minor impact and
2 does not count temporary mat area in the calculus for mitigation and compensation.

3 **Q. Do you believe that the Project changes regarding additional temporary**
4 **wetlands impacts are reasonable?**

5 A. Yes. The use of timber matting is a Best Management Practice (“BMP”) often
6 recommended by resource agencies such as NHDES, the Army Corps of Engineers, and Natural
7 Resource Conservation Service. The construction contractor will follow the New Hampshire
8 Department of Natural & Cultural Resources 2018 publication, *Best Management Practices*
9 *Manual: Utility Maintenance in and Adjacent to Wetlands and Waterbodies in New Hampshire*
10 ([https://www.nhdfi.org/DRED/media/Documents/New_Final_UTILITY_BMP_Manual_10_25_18.](https://www.nhdfi.org/DRED/media/Documents/New_Final_UTILITY_BMP_Manual_10_25_18.pdf)
11 [pdf](https://www.nhdfi.org/DRED/media/Documents/New_Final_UTILITY_BMP_Manual_10_25_18.pdf)) during the installation of the timber mats and the construction of the tap structure. Timber
12 mats are routinely used for utility line construction projects to protect wetlands from excessive
13 rutting, preservation of natural drainage patterns, disruption of the wetland soil structure, and
14 conservation of perennial and woody vegetation roots within the wetland areas where mats are
15 placed. Once the timber mats are removed, natural drainage patterns will continue and natural
16 vegetation will be able to grow freely.

17 **Q. Does this conclude your pre-filed testimony?**

18 A. Yes.