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NGO Intervenor Post-Hearing Brief Calls on NH SEC to Deny Northern Pass Permit

Northern Pass fails to meet required “burden of proof” at New Hampshire Site Evaluation Committee

Today the NGO Intervenor group in the NH Site Evaluation Committee (SEC) Northern Pass adjudicatory hearings, comprised of the Appalachian Mountain Club (AMC), the Conservation Law Foundation (CLF), and Ammonoosuc Conservation Trust (ACT), submitted their post-hearing brief and requested the SEC to deny Northern Pass’s application for a certificate.

The NGO brief argues that Northern Pass has failed the required “burden of proof” test, and as proposed will have a profound and long-lasting unreasonable adverse effect on the aesthetics and environment of New Hampshire, and will also unduly interfere with the orderly development of the State. Taken as a whole, the adverse effects of the proposed Project outweigh any benefits to New Hampshire, and the Project is not in the public interest.

The almost 100-page NGO brief provides abundant evidence of the Northern Pass application’s deficiencies and inaccuracies, including basic mathematical errors, biased analyses, and disregard for the rules governing the permit application process. The full brief is available [here](#).

The proposed HVDC transmission line would impact 192 miles of New Hampshire from Canada to Massachusetts. For example, the Project as proposed would:

- Add 1,826 new or enlarged transmission towers of 20th century technology in 69% of the route, towers that greatly exceed tree height, and some greater than the height of the State Capitol building.

- Cut thirty-two miles of new Right of Way in northern Coos County, fragmenting forests and destroying rare natural plant communities.

Northern Pass would be the largest industrial feature on NH's landscape ever built, and is opposed by every town but one that it goes through. In the over 3,000 officially filed public comments, the Project was opposed by greater than 15:1, with aesthetic impacts a dominant concern.

The Applicants' visual impact analysis fails the straight face test, using only a single, out-of-state, "expert" opinion; an expert who never used or solicited any public input in NH. This "expert" claimed that 192 miles of transmission corridor would not impact the public's "use and enjoyment" of the thousands of scenic resources—such as state parks, designated rivers, and scenic drives-- from which the Project would be visible.

Contrary to the case made by Northern Pass, the Project will unduly interfere with the orderly development of the region. Benefits to potential future regional energy markets are not substantiated, overly optimistic, and may in fact negatively impact local clean energy development. The state would not be the direct beneficiary of greenhouse gas (GHG) reduction attributes associated with Northern Pass, and would have no claim to any environmental attributes that may attach to resources transmitted over Northern Pass. Finally, the Applicants' failed to provide the SEC required decommissioning funding (instead offering up a plan to make a plan) that could leave NH taxpayers holding the bag for an estimated \$99 million in decommissioning costs, should the Project at some point be deemed uneconomic by its owners.

The SEC will begin holding public deliberative sessions on January 30th to reach a decision by the end of February.

Appalachian Mountain Club is the nation's oldest conservation and recreation organization, whose mission is to promote the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Northeast and Mid-Atlantic regions. AMC has opposed Northern Pass since its inception more than eight years ago. Visit our pages at www.outdoors/northernpass for additional background on AMC's position.

Conservation Law Foundation (CLF) protects New England's environment for the benefit of all people. CLF uses the law, science and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy

Ammonoosuc Conservation Trust is the nationally accredited, locally based, grassroots nonprofit lands conservancy serving New Hampshire's North Country
