

THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Petition of Northern Pass transmission, LLC, to Cross Public Waters

Docket No. DE 15-460

KRIS PASTORIZA'S PETITION TO INTERVENE

I petition the Public Utilities Commission to allow my late intervention in the above-captioned matter in accordance with RSA 541-A:32 and NH Admin.Rule Puc 203.17 stating as follows:

On October 19th, 2015, Northern Pass Transmission, LLC filed a Petition to Cross Public Waters with the Commission. Three of the proposed crossings are proposed to be located in the Town of Easton.

The Town of Easton and the Easton Conservation Commission have an interest in the proposed crossings but the Town found out about them only yesterday and the Conservation Commission has not been notified. I have an interest in the crossings because they will substantially effect the public rights in public waters within the Town and will harm both the Town and the public to an extent not necessary for the reasonable provision of service to the public.

The applicant has provided no data on the time the underground route and crossings will take to be completed, the expected level of public exposure to noise, traffic congestion, and air and waterborne pollutants. The Easton Fire Department and Town Hall are both adjacent to the "middle" proposed "crossing" and the applicant has provided no information on how their proposed construction will avoid significant interference in the Town's and residents' use of these necessary facilities.

The applicant has failed to provide complete specs for their proposal or material safety data sheets. Their water depth is estimated, they provide no information on the existence of bedrock, archaeological resources in or under the ROW, aquifers; their transmissivity and their distance below the roadway, or nearby wells. They have failed to state many details, for example: In controlling groundwater infiltration into pits and horizontal boring/tunneling, sometimes gelling chemicals are introduced to slow this down. 3M used to produce these. They were deadly to everything that came into contact with them. Serious amounts of nitrate compounds will be introduced with blasting. Some explosives even use rocket fuels. Residuals of all go into the ground below.

The Applicant's specs for the Ham Branch crossing in Easton have no compass rose/directional and no scale. The middle crossing diagram has an un-named stream labeled as the Ham Branch. I am assuming the ROW is incorrectly drawn in as 4 rods, as it is in the other Northern Pass submissions, but I can't tell because there is no scale. The ROW in this area is 3 rods. In addition, there are substantial issues with adverse possession of even a 3 rod ROW by streams and foundations. The on-the-ground conditions, especially near the Town Hall, have not been thoroughly assessed by the applicant.

The applicant has failed to provide proof of thorough consideration of the alternative of burial along I-93. Clearly small towns are an easier opponent to take on, as is seen in the absence of intervenors in this docket.

The applicant has failed to provide proof of ownership of the land under the road.

I request that the Public Utilities Commission grant my petition, in as much as I am the only person with the knowledge and resources at this time, to intervene on behalf of the Town of Easton.

I request that the PUC extend the time for intervention, given the failure of communication between the applicant and the affected Towns.

Respectfully submitted March 31st, 2016,

Kris Pastoriza



sent by electronic mail to the persons named on the Service List of this docket.