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Department of Environmental Services  
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29 Hazen Drive  
Concord, NH 03301

May 5, 2016

Re: Wetland File No. SEC-2-15-02817

Mr. Rennie,

the Easton Conservation Commission wishes to register its concern with the following issues regarding Northern Pass Transmission LLC and wetlands and water issues:

#1. As early as 2011 the existing ROW was described at a meeting of NPT and EPA as the LEDPA, despite evidence to the contrary submitted by both DOE and NPT.

9/29/2011: NPT & EPA meeting: ""Pre application meeting to discuss format and contents of applications and plan sets. EPA guidance on secondary impacts, unknown impacts, **existing ROW as LEDPA.**" (emphasis added)

In contradiction to this, the Draft EIS states: "The portions of Alternative 7 that would be constructed underground along existing roadways would impose the fewest environmental impacts due to the lack of visual impacts and use of previously-disturbed roadway corridors. "

#2. Applicant has provided no data regarding blasting on Route 116 and 112 in Easton, nor any results of seismic studies, groundwater flow mapping, aquifers; their locations, depths, transmissivity, well mapping (private and town) and drilling results. They have not done any pre-monitoring that we know of, nor indicated intent to do so. Please see aquifer map at the end of this letter.

In contrast, the Supplement to Draft EIS lists 1,124 acres overlying aquifers on proposed action, and 1,124 acres in FEMA flood zone.

**Table 19. Water Resources Summary Impact Table**

Alternative	Wetland Disturbance acres (ha)			Impacts to Vernal Pools acres (ha)	Disturbance in Locations Overlying Aquifers acres (ha)	Disturbance in FEMA Flood Zones <sup>a</sup> acres (ha)	Miles (km) of Impaired Rivers Crossed
	Direct	Temporary	Secondary				
1 (No Action)	--	--	--	--	--	--	--
2	26 (11)	82 (33)	8 (3)	0.2 (0.1)	453 (183)	1,196 (484)	0.3 (0.5)
3	2 (1)	162 (66)	4 (2)	0.2 (0.1)	452 (183)	1,003 (406)	0.4 (0.6)
4a <sup>b</sup>	2 (1)	8 (3)	<0.1 (<0.04)	--	216 (87)	255 (103)	0.3 (0.5)
4b <sup>b</sup>	2 (1)	8 (3)	0.3 (0.12)	--	226 (91)	272 (110)	0.3 (0.5)
4c <sup>b</sup>	2 (1)	8 (3)	<0.1 (<0.04)	--	219 (89)	262 (106)	0.3 (0.5)
5a	25 (10)	69 (28)	8 (3)	0.2 (0.1)	462 (187)	1,097 (444)	0.3 (0.5)
5b	25 (10)	78 (32)	8 (3)	0.2 (0.1)	464 (188)	1,166 (472)	0.3 (0.5)
5c	25 (10)	69 (28)	8 (3)	0.2 (0.1)	471 (191)	1,106 (448)	0.3 (0.5)
6a <sup>b</sup>	3 (1)	9 (4)	<0.1 (<0.04)	--	343 (139)	259 (105)	0.2 (0.3)
6b <sup>b</sup>	3 (1)	9 (4)	<0.1 (<0.04)	--	352 (143)	276 (112)	0.2 (0.3)
7 (Proposed Action)	23 (9)	65 (26)	7 (3)	<0.1 (<0.04)	382 (155)	1,124 (455)	0.2 (0.3)

This is an updated version of **Table S-20** in the draft EIS.

Notes:

<sup>a</sup> Including all Federal Emergency Management Agency (FEMA) Flood Zones (Zone A, Zone AE, and Zone X).

<sup>b</sup> No wetland pools were identified in the Project corridor. Additional surveys may be conducted, as necessary.

Northern Pass estimates for DES list the permanent impact to wetlands for their proposed route as 2.7 acres, and temporary impact as 137 acres. Draft EIS estimates permanent impact to wetlands at 23 acres. We do not accept NPT's methodology which does not take into account wetland and streams outside of the rights-of-way and road beds.

#3. Draft EIS supplement estimates 2 acres direct damage with complete burial using I-93, compared to 23 acres, for the Proposed Route. Avoidance should have been considered as part of the selection of the route.

#4. Applicant has provided no MSDS for chemicals used during blasting and boring. We are concerned with chemical infiltration from these as well as other sources such as concrete, vehicles and exhaust. We are also concerned with sedimentation of streams and rivers.

#5. Applicant has provided no data on effects on water flow of trenches and sealed bores.

#6. We concur with the concerns expressed by the Society for the Protection of New Hampshire Forests in their letter to DES dated April 21, 2016, Re: Wetland File No. SEC -2-15-02817.

Sincerely,

Easton Conservation Commission

Kris Pastoriza, Chair

Roy Stever

Steve Sabre

Carl Lakes

Beth Harwood

Deb Stever

Finn Goodwin

Cc:

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