



**Lamprey Rivers
Advisory Committee
c/o 203 Wadleigh Falls Road
Lee, NH 03861**

www.lampreyriver.org

*Protecting the rivers that connect our fourteen
communities*

Barrington, Brentwood, Candia, Deerfield,
Durham, Epping, Exeter, Fremont, Lee,
Newfields, Newmarket, Northwood,
Nottingham, Raymond

August 4, 2016

Ms. Lee E. Carboneau
As agent for Northern Pass Transmission, LLC
Normandeau Associates, Inc.
25 Nashua Road
Bedford, NH 03110

RE: WETLAND FILE NO. SEC-2-15-02817 - NORTHERN PASS TRANSMISSION PERMIT
APPLICATION - RESPONSE TO NORMANDEAU LETTER OF JULY 18, 2016

Dear Ms. Carboneau;

Thank you for your response to our November 9, 2015 letter regarding the environmental damage we noted on several portions of the Eversource transmission line rights-of-way in Deerfield and our concern that the proposed Northern Pass Project will result in additional damage in the same corridor.

We take note of your representation that approved best management practices were in effect during the construction of prior Eversource transmission line upgrades over the past several years; however, your provision of a construction-period photograph of the access road in the vicinity of Church Street, and the direct comparison with our post-construction photograph of the same area does nothing but support our position that SECONDARY IMPACTS have not been adequately prevented, nor are they likely to be prevented by the plans currently being offered for the Northern Pass.

The secondary impacts in the Deerfield corridor are substantial. One can easily review aerial photos available on Google Maps and see the many wetlands that have been disturbed and the number of streams that have been crossed without bridges. No human development anywhere in Deerfield has more visible, and undesirable, impacts than the Eversource transmission

corridor. Left to worsen following the construction of the Northern Pass, damage done in this corridor could alter the resource values and characteristics for which the Lamprey River was designated under RSA 483; therefore, we insist that you either make proper plans to prevent these secondary impacts, or that you plan to use a less sensitive corridor for your project.

In your letter of July 18, 2016, you state that "Eversource does not have the right to prevent access to private property.....", yet just within Deerfield, we can find places where access FROM THE PUBLIC ROADS has been restricted. One such case is on Nottingham Road directly southwest of the sub-station, where there are gates on both sides of the road. Obviously, there had to be some form of cooperative agreement between the property owner and Eversource to construct those gates and provide both parties with keys, and we contend that it is entirely possible to have similar arrangements elsewhere in Deerfield.

You also stated that ".....the company is not responsible for ATV use or other public access issues in the ROW if owned by others." Quite conversely, we contend that by providing a construction route over wetlands in the first place and then making absolutely no effort to prevent the secondary impacts, you ARE in fact responsible for the damage done by ATVs and other unauthorized users.

Regarding the specifics of damage just to the north of Mountain Road, we take issue with your conclusion that the damage might have been caused by regular ATV use. You noted that this "gravel road" has been in use since at least 1992. We concur that the access has been in use for many years, but observed that it is a grassy slope over naturally occurring glacial drift that was stable and vegetated as late as when we inspected it for your prior permit. There is a gate at the top of the hill which prevents through use by ATVs. Further, there is no continuation of any ATV trail on the other side of Mountain Road. This route serves only as an access to a farm field at the top of the hill. It seems quite likely that the damage was done by crews that were sent in to work on the ground in support of your helicopter mission.

The proponent's position that it bears no responsibility for the secondary impacts that it encouraged through the construction of the access routes and subsequent lack of measures to deter unauthorized use of those corridors following close of construction is unacceptable in this day and age. Every proponent has an obligation to secure the project site and to keep it secure following his or her presence on the site. Foresters routinely install boulders or large logs near the public roadways when they are done with their logging yards. Landfills are fenced off to preclude entry. Mine entrances are sealed. Gravel pits are gated. Old railroad lines have gates or barricades put up after the rails are removed. Mothballed buildings are boarded up and locked. Only the power company's transmission corridors are left with the front door wide open.

Enough!

Very truly yours,


Preston L. Samuel, chair

Project Review Subcommittee

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Photo taken by Normandeau, June 02, 2014



Photo taken by LRLAC 10/29/2015