



New Hampshire Association of Conservation Commissions

SERVING NEW HAMPSHIRE'S COMMUNITIES SINCE 1970

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New Hampshire Department of Environmental Services
Attention: Tim Drew, Administrator/Permitting
29 Hazen Drive; PO Box 95
Concord, NH 03302-0095

New Hampshire Site Evaluation Committee
Attention: Pamela Monroe
21 South Fruit Street, Suite 10
Concord, NH 03301

Dear Mr. Drew and Ms. Monroe

The New Hampshire Association of Conservation Commissions (NHACC) respectively asks the Department of Environmental Services (DES) and the Site Evaluation Committee (SEC) to consider the following in regards to the recent permit applications submitted by the applicant of the Northern Pass project to municipalities.

Since it is still unclear whether the normal procedures apply for review of dredge and fill, Shoreland impact permit applications (and others) and because the sheer magnitude of the applications is overwhelming, municipalities need more time to review the applications. We respectfully request that:

a. The SEC affords DES more time beyond the current November 13 deadline for determination of administrative completeness and the SEC extends its decision date beyond December 18. This will afford municipalities adequate time to review this significant application and help determine its completeness, which will allow them time to properly advise DES.

b. We request that the typical DES 14-40 day limit to comment on applications be extended as well to Conservation Commissions. We suggest an extension of at least several weeks beyond the end of November OR at least until whatever date the SEC decides it will declare the application administratively complete. Right now that date is December 18. Some commissions currently have until only November 23 to submit technical comment in order to meet the 40-day DES comment limit. This doesn't seem to be relevant, since DES will not be required to review the technical aspects of the application until after the SEC determines the application to be administratively complete.

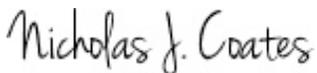
Conservation commissions in smaller municipalities, for example, meet monthly so the current window of time is realistically shrunken to 10-14 days if they wish to comment. This is also not enough time to have a

thorough technical review of the applications, which are proposing major impacts on natural resources.

In addition, most of the communities within the right of way and abutting communities have limited resources. We therefore request that field inspection staff from DES attend site walks in each municipality that plans to take one as part of their review of dredge and fill, Shoreland impact and other permits and that staff provide direct technical assistance to the municipalities as they review applications. This will ensure a consistent, thorough and scientifically sound approach to the review process.

Thank you for your consideration and please feel free to contact me with any comments. We appreciate the ongoing efforts of DES and SEC to include local input in natural resource impact decisions.

Sincerely,



Nicholas J. Coates
NHACC Executive Director

CC: NHDES - Collis Adams, Sandra Mattfeldt; Municipal Representatives - Allenstown, Ashland, Bethlehem, Bridgewater, Bristol, Campton, Canterbury, Clarksville, Concord, Dalton, Deerfield, Dixville, Dummer, Easton, Franconia, Franklin, Hill, Lancaster, Millsfield, New Hampton, Northfield, Northumberland, Pembroke, Pittsburg, Plymouth, Stark, Stewartstown, Sugar Hill, Thornton, Whitefield, Woodstock

The New Hampshire Association of Conservation Commissions (NHACC) is a nonprofit membership organization for the 216 municipal conservation commissions in our state. The association serves as a resource network as well as a source of technical advice, education, and advocacy for all of our members and for the cause of conservation throughout New Hampshire. Our mission is to foster conservation and appropriate use of New Hampshire's natural resources by providing assistance to conservation commissions, facilitating communication and cooperation among commissions, and helping to create a climate in which commissions can be successful.