



**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

Dori Wiggin
NHDES Wetlands Bureau
PO Box 95
Concord, NH 03302-0095
November 9, 2015

re: Northern Pass Transmission Project, Deerfield, NH
proponent: Eversource Energy Service Corporation
agent: Normandeau Associates
file #: unknown

Dear Ms. Wiggin:

The above-referenced project is within the quarter mile corridor of the Lamprey River and is, therefore, subject to review by the Lamprey Rivers Advisory Committee (LRAC) according to NHRSA 483. The project application was received by the LRAC and sent to the Project Review Subcommittee for review. Upon final review, we offer the following comments:

1. Documents reviewed were a Wetlands Dredge and Fill Permit Application, undated, and Supporting Narrative Report prepared by Normandeau Associates. This was transmitted to us under a cover letter, dated October 14, 2015.
2. The proponent wishes to construct a new transmission line from the Canadian border in Pittsburg to a major substation in Deerfield and also to upgrade several towers on an existing transmission line from the Deerfield Station to Londonderry, NH.
3. The application indicates extensive inventory of environmental resources within the existing right-of-way for the entire route.
4. The report and plans prepared by Normandeau for this application are very similar to the documents prepared for other recent projects by PSNH/Eversource. Whereas the LRAC has reviewed applications for two other projects in the same right-of-way corridor within the Lamprey River watershed in 2013 and 2014, we began our review by conducting a brief field walk on 10/29/2015 to evaluate the effectiveness of wetland protection strategies proposed by Normandeau. Our reviews were conducted in the vicinity of the crossings of Mountain Road and Church Street in Deerfield.
5. At the Mountain Road site, we reviewed the proposed access route on the northerly side of the road. This route has been used for the other recent upgrading projects and deterioration

of the steep slope just upgradient of the first proposed tower location work area was noted. Erosion has occurred, resulting in the recent formation of a silt delta in the work area. Additional traffic over this steep slope will certainly result in more erosion, which could soon affect the downgradient wetland located just to the north of Mountain Road. It appears likely that the noted deterioration could have been prevented, had the slope been properly hydroseeded following the last construction project.

6. At the Church Street site, a much more significant problem was observed. Vehicles have been allowed to drive through a wetland located about 150 feet to the west of the public road. The breach of wetlands has been severe enough to bring subsurface soils up and there has been no apparent effort to restore the site since this happened. Pictures are attached hereto to document our findings. We reviewed aerial photos currently posted on Google Maps and noted similar conditions at all apparent wetland areas, including a brook crossing, from Church Street to the right-of-way junction located approximately 3000 feet to the west.
7. Existing conditions of this sort can only be the result of one of two inactions. The first could be that the BMPs designed by Normandeau were never put in place during construction of the power line upgrading projects. The second could be that the damage occurred following the completion of the PSNH/Eversource projects. These secondary impacts are quite possible where access to the right-of-way is not controlled following construction.
8. Due to the sensitivity of the Northern Pass Transmission Project, we recommend that an independent inspection agent be engaged at the proponent's expense and that this agent be required to file daily reports with the NHDES during construction. This will assure that the BMPs are properly installed before commencement of construction and that they are maintained properly until the close of the project.
9. The wetland damage encountered at the Church Street location should certainly validate our second recommendation, made twice before in our previous reviews. That recommendation is for gates to be installed prior to the close of the project to preclude secondary access by undesired parties.
10. While we have not reviewed the entire access road layout, we note that at the Church Street location a different access is planned from the one used previously. Given that the prior access is now significantly disturbed, why is it necessary to disturb another area for the Northern Pass project?

Thank you for the opportunity to comment on this project.

Respectfully,



Todd Piskovitz
Project Review Subcommittee chair

cc: Tracie Sales, NHDES
Deerfield Conservation Commission, Planning Board
Normandeau Associates

