November 13, 2015

Collis Adams, Administrator (collis.adams@des.nh.gov)
Wetlands Bureau
New Hampshire of Environmental Services
29 Hazen Drive, P.O. Box 95
Concord, NH 03302-0095

Re: SEC Docket No. 2015-06
Northern Pass Project

The Bethlehem Conservation Commission has some general comments regarding the Northern Pass project and its impact in Bethlehem.

Due to the various deadlines, at the moment we are simply commenting on the completeness issue.

It is our understanding that today, November 13, the Department of Environmental Services (DES) has to let the Site Evaluation Committee (SEC) know whether the application is administratively complete. And we, as do others, have concerns over the completeness issue.

This concern is based on the fact that, as NEPGA notes in its November 10, 2015 letter to the SEC, the Northern Pass Transmission application “fails to demonstrate site control over the lands necessary for the development of the transmission facilities as required by statute and SEC regulations… including requiring that an applicant hold the necessary site control rights to each aspect of the project” and, as the Forest Society notes in its November 9, 2015 letter to the DES, that the Forest Society “has property interests in land that Northern Pass proposes to use for its electric transmission line.”

We would, therefore, ask that DES spend the time necessary to conduct due diligence on this matter of completeness and request more time from the SEC, if needed, to come to a decision on this matter. This is an extremely important project and will have a tremendous impact on the towns in its path.

We reserve the right to comment again by November 23, which is 40 days from October 15 when the Town Clerk signed the application. We are in the process of hiring a certified wetlands scientist to review the wetlands impacts.

Given the immensity of this project and the short timeframes, we are not certain we can meet that November 23 deadline. However, as we understand, per your e-mail on November 12,
that we may comment at any time before DES issues a decision, although what that date might be is vague.

Sincerely,

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