

Ashland Conservation Commission

Town of Ashland
P.O. Box 517
Ashland, NH 03217

April 13, 2017

New Hampshire Site Evaluation Committee
Pamela G. Monroe, Administrator
21 South Fruit Street, Suite 10
Concord, NH 03301
(via email)

14 APR '17 AM 10:47

**Re: New Hampshire Site Evaluation Committee ("SEC") Docket No. 2015-06
Northern Pass Transmission Project**

Concerns of the Ashland Conservation Commission with the proposed Northern Pass project construction in Ashland

Dear Ms. Monroe:

We understand the Pemigewasset River Local Advisory Committee (PRLAC) intends to submit supplemental pre-hearing testimony for the subject matter. We are writing this letter to formalize our concerns with the potential impacts to the natural resources within the geographical boundaries of the town of Ashland for which we share a common duty to protect, preserve, and promote, should the proposed Northern Pass transmission line project be granted permission for construction. The need for this letter has become apparent after joint meetings of the Ashland Conservation Commission (ACC) and PRLAC on March 22, 2017 and March 29, 2017.

The ACC submitted a petition to intervene to the New Hampshire Site Evaluation Committee (SEC) on January 21, 2016. Intervenor Status was granted to the ACC by the SEC "Order on Petitions to Intervene" on March 18, 2016. The ACC also submitted comments to the New Hampshire Department of Environmental Services (DES), on May 3, 2016, after reviewing the DES applications for Wetlands Permit, Shoreland Permits (2 applications – one for the Pemigewasset River and one for the Squam River), and Alteration of Terrain Permit. Since the time of these communications with those authorities having jurisdiction over the application, we have refined our concerns with potential impacts to Ashland's natural resources by construction of the proposed project.

We would like to present our concerns framed in the context of the passage of a petitioned warrant article which appeared on the March 2017 ballot in Ashland. Article 41, titled "Opposition to 'Northern Pass'" was passed by the voters 248 to 109. The text of the article read as follows:

We the people of the Town of Ashland hereby affirm our continued support of the Ashland Water and Sewer Department, Ashland Conservation Commission and the board of Selectmen who are acting on the Town's behalf for the protection of Ashland's natural resources and assets as intervenors in the State Site Evaluation Committee's (SEC) proceedings under "Docket No. 2015-06 (Joint Application of Northern Pass Transmission LLC and Public Service Company of New Hampshire D/B/A/ Eversource Energy for a Certificate of Site and Facility to Construct at New Voltage Transmission Line and Related Facilities in New Hampshire)" relating to the proposed Northern Pass Transmission line.

We, the commissioners of the Ashland Conservation Commission, feel a certain sense of obligation to continue to act on the Town's behalf for the protection of Ashland's natural resources

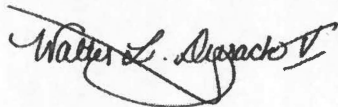
The ACC has identified six key issues in common with PRLAC for which we have refined the scope of our understanding. We have previously identified most of these issues in our May 3, 2016 letter to DES. We find it troubling that DES granted approval of the permit applications without specifically addressing our concerns. These issues are summarized as follows:

- **Construction in Wellhead Protection Area** – application documents indicate an access road will be built along the existing transmission line right-of-way (ROW). This ROW passes through the heart of the Wellhead Protection Area (WPA) encompassing Ashland's sole municipal water source. Furthermore, the access road and construction activities will occur within the 400-foot sanitary protection area surrounding the well.
- **Flood Plain Encroachment** – application documents indicate the floodplain encroaches on the existing transmission line ROW. Therefore, construction work taking place within the ROW will be taking place within the statutory floodplain of the Pemigewasset River.
- **Tree Trimming & Cutting** – application documents indicate extensive tree cutting and vegetation trimming to take place within the existing transmission line ROW. Most of the cutting and trimming will take place within the riparian buffer of the Pemigewasset River. It is well understood that riparian buffers play a key role in increasing water quality, by regulating water temperature, filtering surface runoff, and stabilizing bank slopes, among other vital functions.
- **Potential Release of Toxins** – buried solid waste and contaminated soils are known to exist from the construction of Interstate 93 and the relocation of the B & M Railroad ROW and may be uncovered during construction of the proposed project. The type, quantity, and location of solid waste and contaminated soils is not well documented. Application documents do not indicate the presence of toxic substances and no provisions for identifying, mitigating, or disposing of them.
- **Rupture of Wastewater Impoundment** – application documents indicate proposed towers will be located within 50 to 100 feet of the town's municipal wastewater treatment lagoons, monitoring wells, and sensor apparatus. Construction equipment and construction activity (e.g. drilling and blasting) could damage the clay-liners of the lagoons and/or the sensitive monitoring equipment. The cumulative impoundment area of the treatment lagoons is designated as a dam by DES. Any breach of this impoundment could result in the discharge of untreated effluent, as hazardous waste, into the Squam River or the Pemigewasset River, both of which are in close proximity to the municipal wastewater treatment facility.
- **Construction Access through Squam River** – some application documents indicate swamp mats will be used to span the Squam River near the municipal wastewater treatment plant. Other application documents indicate the existing, municipally-owned bridge will be reinforced. A state-recognized wetland is situated directly downstream of the proposed crossing. This highly sensitive area will be directly impacted by any in-water activities.

Thank you for your consideration of our concerns.

Sincerely,

Ashland Conservation Commission



Walter Durack, Chair

Commission Members:

Harold Lamos

Amanda Loud