

To: Pamela.Monroe@sec.nh.gov

Date: January 19, 2016

Subject: Petition to Intervene, SEC Docket No. 2015-06

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Re: New Hampshire Site Evaluation Committee ("SEC") Docket No. 2015-06 Northern Pass  
Petition to Intervene

Dear Ms. Monroe:

The Conservation Commission of the Town of Dalton respectfully requests to intervene in the SEC's proceedings under Docket No. 2015-06 which relates to the proposed Northern Pass transmission line. Per the SEC's regulations, we are sending this request to you, with copies to the SEC's distribution list for this proceeding as noted in the "cc" below.

The published preferred route for Northern Pass crosses a little over 2 miles of the Town of Dalton. It appears to transect Dalton tax map parcels 413-109, 413-106, 413-122, 413-0, 413-123, 413-75.1, 413-75, 413-73, 413-71, 413-66, 413-5, 413-5.1, 413-62, 413-7, 413-8.2, 413-8.1, 414-1, 414-2, 408-106, 408-105, and 408-103.

The Dalton Conservation Commission seeks to intervene based on a variety of impacts to the Town including, without limitation, the following:

1. Damage to wetlands, degradation of shoreline, and deterioration of water quality

The John's River runs 7.1 miles through Dalton, NH with confluence at the Connecticut River. The proposed Northern Pass crossing of the John's River takes place at the beginning of the seven-plus river miles which flow within Dalton's boundaries. The construction site lies within the river's floodplain.

Dalton's Natural Resource Inventory (NRI) performed in August 2005 states "the relevance and importance of the quality of the water in the John's River cannot be overstated" for the following reasons:

- Dalton's portion of the John's River is important as it feeds a stratified aquifer along most of its length. This aquifer represents a potential water source for the town of Dalton.
- The natural community consisting of the river, riverbank and riparian buffer are rich with aquatic and terrestrial wildlife. Each type of natural community has a unique set of environmental conditions that support certain species that have adapted to those conditions. Any disturbance resulting in erosion, pollution or contamination of the river has the potential to negatively impact this important habitat.

## 2. Endangering the natural environment

Dalton's Natural Resource Inventory (NRI), previously referenced above, clearly details the importance to the Town of permanent openings and riparian habitats.

### a. Permanent Openings

"As the percentage of non-developed permanent openings in New Hampshire has decreased significantly over the past 50 years, the state is encouraging landowners to create or maintain permanent openings as important wildlife habitat."(p.16)

"The largest percentage of permanent open areas is found along the Johns River riparian and flood plain area."(p.17)

This is precisely where the proposed facility wants to place their destructive towers.

### b. Riparian Habitat

"The diverse riparian habitat in Dalton...support(s) numerous songbirds, including ground nesters, raptors, ducks, herons, bank swallows, and many other avian species too numerous to list."(p.13) "These riparian buffers provide travel corridors containing shelter, food, and birthing places for numerous terrestrial mammals such as white-tailed deer, moose, black bear, raccoons, skunks, red and gray fox, coyote, weasel, mink and smaller mammals. Closely linked to the above mammals are the numerous beaver, muskrat, and river otter that utilize the rivers, ponds, and open water while frequenting the shoreline and various vegetated habitats."(p.14)

"Existing ones [riparian buffers] should be extended and protected. Riparian landowners should be encouraged to retain, enhance, or improve buffers along the riverfront."(p.28)

The Northern Pass proposed site and facility flies in the face of these recommendations. The Town of Dalton is very concerned about the implications.

Dalton is urged in the NRI to retain existing and promote the growth of additional riparian buffers which are critical to maintaining water quality, erosion prevention, fisheries habitat, wildlife travel corridors, and flooding minimization. The proposed facility would cross the John's river creating concern for the degradation of this riparian buffer and shoreline.

## 3. Recreation

Recreation areas within Dalton will be affected by the SEC's Northern Pass proceedings. The installation of overhead HVDC transmission lines as sought by Northern Pass will negatively affect the recreation experience within the Town. Recreational activities utilizing the John's River such as kayaking, canoeing and fishing will be adversely

affected. Two of the 17 recreational sites identified in the July 2015 Draft Environmental Impact Statement (3-65) are located in the Town – Forest Lake State Park and the Dana Conservation Easement.

The Dalton Conservation Commission desires to intervene and to be at the table during the Site Evaluation Committee adjudicative process to defend the Town's interest regarding the above mentioned impacts.

Thank you for your consideration of this petition.

Sincerely,

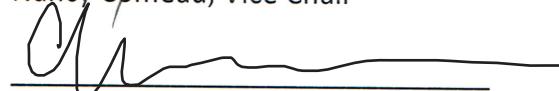
Conservation Commission  
Town of Dalton

Absent for this meeting

Doug Ingerson, Chair

 Vice Chair

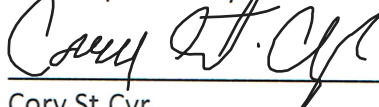
Nancy Comeau, Vice Chair



Christine Rouillard, Secretary



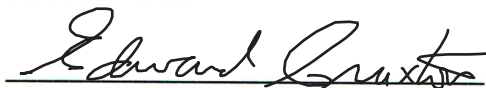
David Spreadbury



Cory St.Cyr

Absent for this meeting

Vanessa Hines



Edward Craxton

cc: SEC distribution list (as of the date of this email) for Docket No. 2015-06. Copies sent by email.