

Franconia Conservation Commission  
421 Main Street  
Franconia, NH 03580

January 28, 2016

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

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 Franconia 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 Franconia Conservation Commission's mission includes "the proper utilization and protection of the natural resources in the Town of Franconia". Thus, we have substantial interests that will be affected by the Northern Pass proposal as currently filed with the SEC, which proposes burial of a HVDC 320-kV line through our town along NH Routes 18 and 116.

Our interests include, but are not limited to:

1. Protection from alteration and degradation of the pristine waters of the Franconia portions of the Gale River and its tributary the Ham Branch, as well as both those rivers' tributaries which the Northern Pass proposed route runs immediately adjacent to, and/or crosses.
2. Protection from degradation the riparian buffer zones of the Gale River, the Ham Branch, and all their tributaries, the largest of which are Coppermine Brook and Tucker Brook. The Ham Branch riparian zone along its entire course in Franconia and Easton is judged by the 2015 NH Wildlife Action plan as a "highest ranked habitat in New Hampshire". Additionally, in Franconia there is a small portion of land near Coppermine Brook confluence of the "highest ranked habitat in the biological region". There are more areas of "highest ranked habitat in the biological region" further upstream the Ham Branch (in Easton), which support wildlife diversity and protect the Franconia section's water quality as well as wildlife, plant, and aquatic species.
3. Protecting from degradation other natural areas in Franconia.
4. Preserving the aesthetic appeal of Franconia's natural resources.
5. Protecting the rich diversity of wildlife, fish and native flora along this corridor.
6. Protecting Franconia's watersheds.

The Northern Pass transmission line burial in Franconia, as proposed in the SEC filing, will disrupt, alter, and potentially threaten the waterways, riparian zones, flora, fauna, and potentially thus the aesthetic appearance along its route. This will occur during construction, and potentially have long-term impacts during the operational phase. Some of these long term impacts are difficult or even impossible for Northern Pass to predict, since an underground 1090 MW 320 kV HVDC line such as is proposed has not previously been constructed and operated in rural and residential neighborhoods in North America or Europe.

Some of the construction impacts can be partially predicted, since construction requires heavy equipment, trenching, potential blasting, noise, fill, staging, and installation pits. Building splicing stations creates even larger areas of disturbance in sensitive areas. We think that Northern Pass is underestimating these.

Additionally, construction of this magnitude poses a risk for spreading invasive species along our roadways and along riparian buffers of those 2 rivers. Japanese knotweed is one example. Currently Franconia has very little Japanese knotweed. Along our streams impacted by this route there is only one small stand of Japanese knotweed, on the southwest side of the Gale River where it goes under Rte 116. This is where the plan calls for tunneling under the Gale River. We are concerned that this construction will cause contamination of other areas with Japanese knotweed. There are 2 smaller areas of knotweed, not adjacent to rivers, further south on Rte 116 which could also be spread.

Once up and running, the transmission line, which will be 120-135 degrees F (45-55 degrees C) might incrementally increase adjacent water temperatures, especially in the small tributaries, adjusting the microenvironment to make it less hospitable to species of fish which require cold water to live and breed, to give but one example of what may potentially damage our local resources.

Other potential impacts once the line is operational would be damage to the line by flooding, since both the Gale and the Ham Branch are susceptible to flooding in all seasons, due to various combinations of rain, snowmelt, and ice jams. If damaged, repairing and replacing the line would create new environmental impacts.

There may indeed be other impacts we are not yet aware of, in part because the proposed plan doesn't include much detail as to the exact siting of the line, nor of the siting of the splicing pits and staging areas.

The Franconia Conservation Commission believes we have substantive and direct interests in the current SEC process. Thank you for your consideration of this petition.

Sincerely,

Conservation Commission  
Town of Franconia

Kim Cowles, Chair  
Kathy McCarthy, Secretary  
Mary Grote  
Red McCarthy  
Eric Pospesil  
Chris Nicodemus  
Virginia Jeffryes

Cc: SEC distribution list (as of 1/28/2016) for Docket No 2015-06. Copies sent by email.