

To: Pamela G. Monroe, Administrator  
New Hampshire Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301  
[pamela.monroe@sec.nh.gov](mailto:pamela.monroe@sec.nh.gov)

Date: 11-January-2016

**Re: NH Site Evaluation Committee Docket No. 2015-06  
Northern Pass Transmission and Public Service Company of NH d/b/a Eversource Energy**

**NHDES File #2015-02829 Northern Pass Shoreland Permit Application for the HV/DC  
transmission line crossing of the Ammonoosuc River along Route 116 in Bethlehem, NH**

Dear Ms. Monroe:

The Ammonoosuc River Local Advisory Committee (ARLAC) opposes this project. We believe this project, as it is proposed, would have a negative impact on the Ammonoosuc River aesthetically, environmentally, and economically. As a result of the committee's opposition, we offer the following for your consideration:

The Ammonoosuc River is a Designated River protected within the NH River Management and Protection Program, under RSA 483. The river is unique in the precipitous drop from its headwaters at Lakes of the Clouds in the alpine zone within the Mt. Washington summit region at 5,018 feet in elevation, descending through the White Mountain National Forest to an altitude of 1,640 feet at the Crawford Purchase, in the Town of Carroll, nearly a 10% drop over approximately 7 miles of river flow (Ref. Ammonoosuc Watershed Region Conservation Plan, 2005).

The river supports diverse habitats critical for aquatic and terrestrial life along its course downstream to the confluence with the Connecticut River. The Bethlehem stretch of the river, classified as "rural river," belongs to the public trust and is possibly the most natural section of mountain stream within the State of NH, essential to the wild trout we are so fortunate to have.

Management of rural rivers carries the stipulation "to maintain and enhance the natural, scenic and recreational values for which the river or segment was designated." The river is managed for brook trout, the only species of trout native to the region, and is stocked annually with rainbow, brook, and brown trout. NH Fish & Game has determined the river is suitable for self-sustaining wild populations of brook trout due to its cool water temperature, natural shading and geological sub straight. There is a "bouldery reach" along the Wing Road area in Bethlehem that offers pockets of shallow riffles and ripples necessary for healthy brook trout propagation.

The riparian zone stability is essential to the health of this crucial river resource for landowners, wildlife, recreation, agriculture and a host of additional uses. (RSA 483)

The section of the river, where the proposed project intends to cross, is fragile and extremely susceptible to erosion into the river due to the sandy glacial till that exists. The LAC feels any disturbance would result in a detrimental effect upon this pristine waterway.

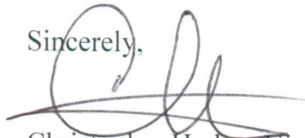
LAC is concerned about the cumulative impact of the project. The project proposes to cut vegetation, including trees higher than 20 ft by the ROW as well as clearing 5,059 sf of upland trees on the east side of the river. The tree canopy provides essential shade that moderates in-stream temperatures for trout habitat. The tree roots stabilize the shore land and provide vital cover for natural fish populations and should be left intact. Damaged wetlands lose their capacity to store runoff water and filter sediment. Shore land disturbances that degrade the immediate area with erosion and siltation affect the river downstream.

Based on soil condition, the proposed 4-concrete tower bases may be required to be cast at excessive inverted depths. This construction method would only add to the detrimental effect upon the rivers riparian area, which the LAC feels is unacceptable.

Maintenance of the proposed project we assume would require yearly vegetation control, which we feel would only offer continued herbicide and erosional damage to the immediate area as well as down stream contamination.

When an application is received, LAC looks for a Stormwater Management Plan, required in NH for a construction project that will disturb one or more acres of land. It was not found within the voluminous document received; if available, please advise where it is located within the document. The application did not provide a post construction maintenance plan. We will provide further comment as additional information becomes available.

Sincerely,

A handwritten signature in black ink, appearing to read 'CHodge', with a long horizontal flourish extending to the right.

Christopher Hodge, Vice Chairman  
Ammonoosuc River Local Advisory Committee

Cc: Darlene Forst, NHDES Shoreland Supervisor