



DEERFIELD CONSERVATION COMMISSION
Deerfield, New Hampshire 03037

22 January 2016

William A. Thomas, CWS
Wetland Permitting Supervisor
NH Dept. of Environmental Services
Wetlands Bureau
PO Box 95
Concord, NH

Jacob Tinus, Project Mgr.-Env. Studies
Burns & McDonnell – NH Field Office
c/o EVERSOURCE Northern Pass
780 N. Commercial St.
Manchester, NH 03101

Martin P. Honigberg, Chairman
New Hampshire Site Evaluation Committee
21 South Fruit St., Suite 10
Concord, NH 03301

Lee Carbonneau, Sr. Principal Scientist
Normandeau Associates
25 Nashua Rd.
Bedford, NH 03110

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

Re: Wetlands review of Northern Pass Transmission Project Impacts
Reference File #2015-02817

Dear Messrs. Thomas, Honigberg & Tinus, Ms. Monroe and Ms. Carbonneau:

The Deerfield Conservation Commission (DCC) writes to follow up on our joint meeting with Eversource representatives and others at our 11 Jan 2016 DCC meeting. That meeting followed as a result of our 16 Nov 2016 DCC letter to the SEC. We also appreciate having had the opportunity for a telephone meeting to address technical issues on 19 Jan 2016 between Jake Tinus of Burns and McDonnell and Kate Hartnett, Acting DCC Chair.

Our purposes in this letter are to:

- a) Provide a local perspective on the permitting process and why we believe it is a flawed process
- b) Suggest several specific steps to improve that process.

DCC provides the following perspectives and questions on the process to date and going forward, including during and after construction, and for ongoing Operations & Maintenance:

- 1) **USE LOCAL KNOWLEDGE:** Given the mutual goal of minimizing wetlands, soils, and habitat impacts, both expected and incidental from support activities, how can local knowledge and expertise most effectively and fairly be incorporated into the review process?
- 2) **ENSURE SCIENTIFIC CONSISTENCY:** With the mostly volunteer nature of local Conservation Commissions, how can DES, SEC, and others ensure scientific consistency in evaluating Northern Pass resource impacts across, as well as within, all 30+ Towns and unincorporated places? The Town of Bethlehem's commissioned *Assessment of Transmission Line Proposal on Natural Resources within the northern half of Bethlehem, New Hampshire, December 2015, Summary Report* identifies some of these issues, in just one Town.
- 3) **PRACTICE SHOULD MEET PROMISES:** There is a documented poor track record from previous PSNH/Eversource projects in the corridor (LRAC 9 Nov 15 letter; Berglund memo and photos 10 Jan 2016). We support both the conclusion in the Town of Bethlehem's *Assessment Report* (Dec 2015) to provide careful monitoring by a qualified biologist (or ecologist), and the Lamprey River Advisory Committee's (LRAC) request that a qualified inspection agent be hired to maintain daily field presence and file daily reports to NHDES during any field work. The goal is to ensure that Best Management Practices are installed and maintained throughout construction (9 Nov 15 letter, p2, point 8). Professionals should be hired at the applicant's expense, but be independent of the applicant. Ms. Hartnett understands from Mr. Tinus that there has been such oversight practice by PSNH in the past. However, in Deerfield, our documented experience has been that it has not been effective.
- 4) **GUARANTEE POST CONSTRUCTION PERFORMANCE:** Some financial mechanism, such as a performance bond, or letter of credit, should be provided at applicant expense, to cover any costs incurred to mitigate and/or correct outstanding post construction oversights, including successful revegetation with native, non-invasive species, good water quality, and no erosion, for least 3 to 5 growing seasons (per Bethlehem report conclusion, and LRAC 9 Nov 15 letter).

DCC and Eversource reps agreed on the complexity of this proposed project's scale, unique in NH history (at least with the current regulatory framework), in that it spans 175 miles, across almost the entire state, and directly impacts at least the 34 towns and unincorporated places listed on the *Summary of Water Resource Impacts* table of 12 Jan 2016. And that the extent of contractor coordination is challenging, especially given the volunteer nature of most Towns and places in the corridor.

In the interest of improving on past performance, starting now, DCC suggests:

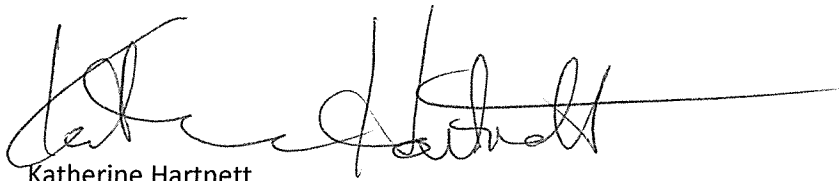
- 1) Make Town specific GIS data available to all. That would allow searches within and between towns.
- 2) Provide project plan sets, maps, and drawings with transparent impact area overlays so that underlying resources can be seen.
- 3) Ensure that each key for plan sets and maps has consistent and complete symbols listed, and that match lines match.
- 4) Provide an effective mechanism that gives equal outreach and useful technical support to all Conservation Commissions or other involved local entities in all 31 towns.
- 5) Provide a reasonable response time for local input after items (1)-(4) are completed.

Background Correspondence:

- Northern Pass meeting section of DCC minutes of 11 Jan 16 meeting
- 3 Lamprey River Advisory Committee letters (Shoreland, AOT, and wetland) of 9 Nov 15;
- DCC Wetland Review objection letter to SEC of 16 Nov 15;
- Berglund memo and photos of 2002-03 PSNH reconstruction, 10 Jan 16
- Excerpts: Report Pages 1 (Cover) and 13 (Conclusion) – *Assessment of Transmission Line Proposal on Natural Resources within the northern half of Bethlehem, New Hampshire*, December 2015, Summary Report Prepared by: Elise J. Lawson (#233) and John C. Severance (#240), Certified Wetland Scientists

Thank you,

Deerfield Conservation Commission

A handwritten signature in black ink, appearing to read 'Katherine Hartnett', with a long horizontal line extending to the right.

Katherine Hartnett
Interim Chairperson

CC: Catalina Celentano – Eversource
Kurt Nelson – Eversource
Peter Roth – NH Dept. of Justice
Thomas Irwin – Conservation Law Foundation
NH Association of Conservation Commissions
Sharon Meeker – Lamprey River Advisory Committee
Preston Samuel – Lamprey River Advisory Committee
Dawn Genes – Lamprey River Watershed Association
Jack Savage – Society for the Protection of NH Forests
Will Abbot – Society for the Protection of NH Forests
Susan Schibanoff – Bury the Northern Pass
Bethlehem NH Conservation Commission
Board of Selectmen – Town of Deerfield
Planning Board – Town of Deerfield
Jeanne Menard – Deerfield Select Board Northern Pass Liaison
Frank Mitchell – Deerfield Conservation Commission Volunteer
Phil Bilodeau – Deerfield Landowner
Members – Deerfield Conservation Commission
The Forum

The following is an extract from the Deerfield Conservation Commission Minutes

DEERFIELD CONSERVATION COMMISSION

Meeting Minutes – January 11, 2016

Norther Pass Transmission Project - Local Wetlands Review:

At the request of Northern Pass, two representatives from Eversource, **Catalina Celentano, (Eversource, Community Relations Specialist, New Hampshire - Eastern Region) and Kurt Nelson (Eversource, Specialist, Project Siting & Permitting Licensing & Permitting Department)**, attended the meeting to address DCC concerns regarding the Northern Pass Wetlands Application, received by the DCC in November of 2015. Their request follows up on the November 16, 2015 letter to the Site Evaluation Committee objecting to the functional inaccessibility of town specific data in the application, and the inadequate time allowed for response.

Acting Chair Hartnett reviewed the main purpose for the meeting, which was to convey directly to Eversource the challenges of local review and reply to the wetlands application as required by RSA. She had invited two representatives from a regional entity, the **Lamprey Rivers Advisory Committee, as well as Deerfield resident Frank Mitchell (familiar with wetland assessment), Jeanne Menard (Deerfield BOS Liaison to the NPT), and Deerfield resident Phil Bilodeau (abutter to the proposed expanded substation)**, to share their experiences as well.

As requested, Ms. Celentano provided the names of two Northern Pass contacts for Deerfield: Lee Carbonneau, Sr. Principal Scientist – Normandeau Associates, and Jake Tinus, Project Manager, Environmental Studies & Permitting – Burns & McDonnell.

Preston Samuel from the Lamprey River Advisory Committee (LRAC) then spoke. He is a civil engineer with considerable national and international professional experience with complex permitting processes. Mr. Samuel is on a subcommittee of the LRAC that routinely reviews DES wetland applications, and has personally reviewed many Normandeau and Eversource Plans. Mr. Samuel spent in excess of 20 hours reviewing the Wetland Application and was “floored” by the complexity of the applications contained on the USB drive. He commented that the plans were confusing, even for an experienced person, citing inconsistent symbols on drawings and the lack of consolidation of data for any given town. He expressed concerns for potential misinterpretation by volunteers or landowners who may not understand the plans, even if they devoted the extensive time required to locate relevant maps. Mr. Samuel concluded that the format of the application is too difficult to reasonably use, and that the time allowed for volunteer review is insufficient. His project specific comments were conveyed in the 9 Nov 2015 letters to NHDES Wetlands, Shoreland, and Alteration of Terrain staff.

Phil Bilodeau, also an engineer, and Deerfield resident whose property abuts the existing Eversource substation (which is slated for significant expansion as a result of the project) is of the opinion that his property will be impacted more severely than any other in Deerfield. He voiced the difficulty he has encountered attempting to extract and interpret specific information for his property from the Wetland Application.

Jim Deely, DCC member, is familiar with GIS analysis. He noted that the impact areas on the maps are not transparent, and so obscure the nature of the underlying resource. He felt that anyone trying to review the permit would benefit from obtaining the GIS data.

Frank Mitchell agreed. Frank had tried to use the application now posted on the Town website to find the proposed impacts in Deerfield. He noted that Alteration of Terrain and Shoreland impacts were organized by Town, but for Wetlands, all he could find was a summary of acreage. He voiced his opinion that use of the *NH Method* (for inventorying and evaluating freshwater wetlands in NH) would be both valuable and appropriate. <http://nhmethod.org/>

The representatives admitted, at 3 full binders and over 700 pages, to the enormity of the wetland data presented; however stated it was not an attempt to mislead the towns. Mr. Nelson acknowledged that DCC presented a valid critique, and although Eversource did not have control over the SEC process, suggested that it would be best for DCC to go through the SEC process for higher level concerns to get them on record. It was further conceded that the Deerfield-specific information DCC is requesting is probably there, but is difficult to locate and compile.

Jeanne Menard, Deerfield Selectboard NPT Liaison, once again urged the DCC to file the application for the motion to intervene. She noted that being granted intervenor status would not obligate the DCC to participate in the SEC process; however it opens the door to DCC's participation should the need arise. Ms. Menard also suggested that DCC could request the SEC to make site visits to understand specific situations. She stated that the BOS is filing a motion to intervene and that she would provide a template to the DCC in advance of the February 5th filing deadline.

Sharon Meeker, also from the Lamprey River Advisory Committee (LRAC), recognized the opportunity for 31 conservation commissions to collaborate to improve the review process for this project, and the outcome on the ground. Asked if LRAC would consider partnering with the DCC in the commission's motion to intervene, Ms. Meeker responded that this would be an LRAC policy decision



**Lamprey Rivers
Advisory Committee**
c/o 203 Wadleigh Falls Road
Lee, NH 03861
www.lampreyriver.org

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Exeter, Fremont, Lee, Newfields, Newmarket, Northwood,
Nottingham, Raymond

Dori Wiggin
NHDES Wetlands Bureau
PO Box 95
Concord, NH 03302-0095
November 9, 2015

re: Northern Pass Transmission Project, Deerfield, NH
proponent: Eversource Energy Service Corporation
agent: Normandeau Associates
file #: unknown

Dear Ms. Wiggin:

The above-referenced project is within the quarter mile corridor of the Lamprey River and is, therefore, subject to review by the Lamprey Rivers Advisory Committee (LRAC) according to NHRSA 483. The project application was received by the LRAC and sent to the Project Review Subcommittee for review. Upon final review, we offer the following comments:

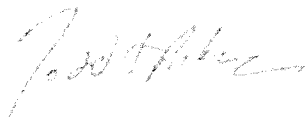
1. Documents reviewed were a Wetlands Dredge and Fill Permit Application, undated, and Supporting Narrative Report prepared by Normandeau Associates. This was transmitted to us under a cover letter, dated October 14, 2015.
2. The proponent wishes to construct a new transmission line from the Canadian border in Pittsburg to a major substation in Deerfield and also to upgrade several towers on an existing transmission line from the Deerfield Station to Londonderry, NH.
3. The application indicates extensive inventory of environmental resources within the existing right-of-way for the entire route.
4. The report and plans prepared by Normandeau for this application are very similar to the documents prepared for other recent projects by PSNH/Eversource. Whereas the LRAC has reviewed applications for two other projects in the same right-of-way corridor within the Lamprey River watershed in 2013 and 2014, we began our review by conducting a brief field walk on 10/29/2015 to evaluate the effectiveness of wetland protection strategies proposed by Normandeau. Our reviews were conducted in the vicinity of the crossings of Mountain Road and Church Street in Deerfield.
5. At the Mountain Road site, we reviewed the proposed access route on the northerly side of the road. This route has been used for the other recent upgrading projects and deterioration

of the steep slope just upgradient of the first proposed tower location work area was noted. Erosion has occurred, resulting in the recent formation of a silt delta in the work area. Additional traffic over this steep slope will certainly result in more erosion, which could soon affect the downgradient wetland located just to the north of Mountain Road. It appears likely that the noted deterioration could have been prevented, had the slope been properly hydroseeded following the last construction project.

6. At the Church Street site, a much more significant problem was observed. Vehicles have been allowed to drive through a wetland located about 150 feet to the west of the public road. The breach of wetlands has been severe enough to bring subsurface soils up and there has been no apparent effort to restore the site since this happened. Pictures are attached hereto to document our findings. We reviewed aerial photos currently posted on Google Maps and noted similar conditions at all apparent wetland areas, including a brook crossing, from Church Street to the right-of-way junction located approximately 3000 feet to the west.
7. Existing conditions of this sort can only be the result of one of two inactions. The first could be that the BMPs designed by Normandeau were never put in place during construction of the power line upgrading projects. The second could be that the damage occurred following the completion of the PSNH/Eversource projects. These secondary impacts are quite possible where access to the right-of-way is not controlled following construction.
8. Due to the sensitivity of the Northern Pass Transmission Project, we recommend that an independent inspection agent be engaged at the proponent's expense and that this agent be required to file daily reports with the NHDES during construction. This will assure that the BMPs are properly installed before commencement of construction and that they are maintained properly until the close of the project.
9. The wetland damage encountered at the Church Street location should certainly validate our second recommendation, made twice before in our previous reviews. That recommendation is for gates to be installed prior to the close of the project to preclude secondary access by undesired parties.
10. While we have not reviewed the entire access road layout, we note that at the Church Street location a different access is planned from the one used previously. Given that the prior access is now significantly disturbed, why is it necessary to disturb another area for the Northern Pass project?

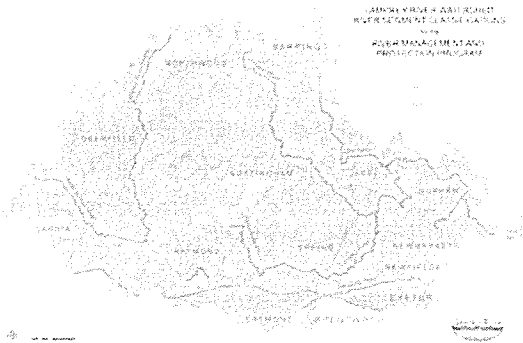
Thank you for the opportunity to comment on this project.

Respectfully,



Todd Piskovitz
Project Review Subcommittee chair

cc: Tracie Sales, NHDES
Deerfield Conservation Commission, Planning Board
Normandeau Associates



**Lamprey Rivers
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c/o 203 Wadleigh Falls Road
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Exeter, Fremont, Lee, Newfields, Newmarket, Northwood,
Nottingham, Raymond

Craig Day
NHDES Shoreland Bureau
PO Box 95
Concord, NH 03302-0095
November 9, 2015

Re: Shoreland Application for Northern Pass Transmission Project, Deerfield, NH
proponent: Eversource Energy Service Corporation
agent: Normandeau Associates
File #: unknown

Dear Mr. Day:

The above-referenced project is within the quarter mile corridor of the Lamprey River and is, therefore, subject to review by the Lamprey Rivers Advisory Committee (LRAC) according to NHRSA 483. The project application was received by the LRAC and sent to the Project Review Subcommittee for review. Upon final review, we offer the following comments:

1. Document reviewed was a Shoreland Permit Application for the crossing of the Lamprey River in Deerfield, dated 10/13/2015, and Supporting Narrative Report prepared by Normandeau Associates.
2. The proponent wishes to construct a new transmission line from the Canadian border in Pittsburg to a major substation in Deerfield and also to upgrade several towers on an existing transmission line from the Deerfield station to Londonderry, NH. The route directly crosses the Lamprey River in Deerfield, near the intersection of Nottingham Road and Mountain Road.
3. The application indicates extensive inventory of environmental resources within the existing right-of-way in the vicinity of the Lamprey River crossing.
4. Within the shoreland area, the proponent wishes to relocate an existing monopole-supported line toward the centerline of the easement and then construct the new

Northern Pass line on lattice-type towers along the southeasterly edge of the right of way. One existing monopole tower will be relocated within the shoreland, one new lattice-type tower will be added within the shoreland on the southeastern side of the river, and one temporary access pad will be placed over a wetland on the northwestern side of the river. It will be necessary to clear 5478 square feet of trees within the right of way and within the shoreland to provide clearance for the new line. Tree stumps will be left in place except where structure excavation is needed. Shrubs and herbaceous vegetation will be left undisturbed whenever possible.

5. The access road on the northwest side of the river will follow the same route used about a year ago for other work in the right of way. We conducted a field review of this access route on 10/29/2015 and noted deterioration of the steep slope just upgradient of the first proposed tower location work area. Erosion has occurred, resulting in the recent formation of a silt delta in the work area. Additional traffic over this steep slope will certainly result in more erosion, which could soon affect the downgradient wetland in the shoreland. The steep slope should be properly stabilized before further traffic is admitted and totally restored after completion of construction. Hydroseeding or a similar treatment should be applied to the steep slope to promote revegetation as a final treatment. A gate should be installed adjacent to Mountain Road to keep unauthorized vehicles out of the area following completion of construction.
6. We note that the proposed locations for the two towers on the southeast side of the river are very close to the 250-foot limit of the shoreland. It would seem expedient to relocate these two towers, as well as the associated work pad, beyond the shoreland limit, which would considerably simplify this application. Additionally, we are concerned about the narrative work description contained under section 3.0 of the supplemental data. The specific design of the tower footings seems to be undetermined, resulting in our inability to judge the exact impacts within the shoreland area. More refined information should be presented and agreed upon before a permit is issued.

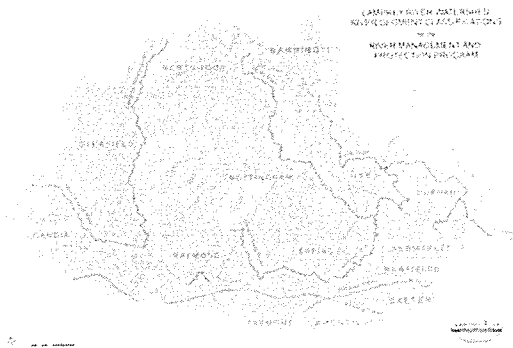
Thank you for the opportunity to comment on this project.

Respectfully,



Todd Piskovitz
Project Review Subcommittee chair

cc: Tracie Sales, NHDES
Deerfield Conservation Commission, Planning Board
Normandeau Associates



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Nottingham, Raymond

Ridge Mauck
NHDES Alteration of Terrain Bureau
PO Box 95
Concord, NH 03302-0095
November 9, 2015

re: Northern Pass Transmission Project, Deerfield, NH
proponent: Eversource Energy Service Corporation
agent: Normandeau Associates
file #: unknown

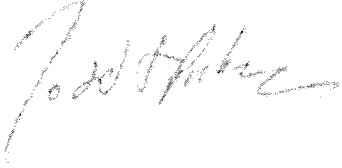
Dear Mr. Mauck:

The above-referenced project is within the quarter mile corridor of the Lamprey River and is, therefore, subject to review by the Lamprey Rivers Advisory Committee (LRAC) according to NHRSA 483. The project application was received by the LRAC and sent to the Project Review Subcommittee for review. Upon final review, we offer the following comments:

1. Documents reviewed were an Alteration of Terrain application, undated, a Water Quality Certificate Application, dated October 14, 2015, and Supporting Narrative Reports prepared by Normandeau Associates. These were transmitted to us under a cover letter from Ms. Lee Carbonneau to Mr. Richard Snow, dated October 16, 2015.
2. The proponent wishes to construct a new transmission line from the Canadian border in Pittsburg to a major substation in Deerfield, and also to upgrade several towers on an existing transmission line from the Deerfield Station to Londonderry, NH.
3. The application indicates extensive inventory of environmental resources within the existing right-of-way for the entire route.
4. Extensive interdisciplinary coordination has been undertaken with various state and federal regulators in the preparation of these applications. We have no comments to add regarding these two applications. Please see comments noted on the wetlands permit application for this project.

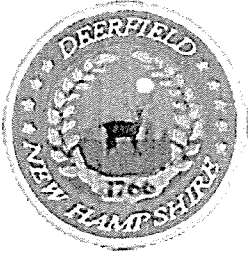
Thank you for the opportunity to comment on this project.

Respectfully,

A handwritten signature in black ink, appearing to read "Todd Piskovitz". The signature is written in a cursive style with a long horizontal stroke at the end.

Todd Piskovitz
Project Review Subcommittee chair

cc: Tracie Sales, NHDES
Deerfield Conservation Commission, Planning Board
Normandeau Associates



DEERFIELD CONSERVATION COMMISSION
Deerfield, New Hampshire 03037

16 November, 2015

Martin P. Honigberg, Chairman
New Hampshire Site Evaluation Committee
21 South Fruit St., Suite 10
Concord, NH 03301

Dear Mr. Honigberg,

On October 15, 2015, the Town of Deerfield, as had many other affected towns in New Hampshire, received notification of the *Wetlands Permit Application* filed on behalf of Eversource Energy Service Corp. for its Northern Pass Transmission (NPT) project.

Although the application was, in part, *intended* for review by the Town of Deerfield, the accompanying documentation covers the entire length of the project from the Canadian border to Deerfield, and defies any ability to coherently review the impacts related to the Town of Deerfield specifically; certainly not in the time frame allotted to the Deerfield Conservation Commission by RSA.

The application arrived, with no context or information on how to access the pertinent information contained in pdf format on the "travel drive" that accompanied the application, and included data for all of the towns crossed by the proposed 192 mile route. Of the five files contained on the drive, the application itself (Volume #5 – NPT NHDES Application-Final) could not even be opened. The fourteen-day window to respond to the DES was further hampered by the fact that most commissions meet only monthly. Given the magnitude of the wetland application, and the scope of the potential impacts in many towns including Deerfield, our all-volunteer organization is severely taxed in its ability to respond substantively within the time frame allowed.

In order to avail itself of the 40-day administrative hold, the Deerfield Conservation Commission filed a letter to the DES informing of its intent to investigate the work proposed in the application; the single option afforded to it by RSA. Unlike the NPT, conservation commissions were not equally considered (as they should have been) when the SEC granted exceptions to NPT, based upon the enormity of the project, in its *Order on Procedural Waiver Request* dated October 15, 2015. The equally enormous task of evaluating the potential impacts on the wetlands affected by this project has fallen on conservation commissions entrusted with the oversight of their towns' natural resources.

As a result, questions to which conservation commissions will need site-specific answers include:

- What are the impacts and what kinds of impacts to our wetlands are expected?
- What are the plans for mitigation?
- What are the plans for erosion controls?
- Will there be stream crossings and, if so, will they be bank to bank?
- How are the corridors to be maintained over time?
- What are the plans for, and resulting impacts of burial?

Given the complexity of the impacts in Deerfield, including its 7.5 miles of corridor and proposed substation expansion, as well as the volunteer nature of its commission, the Deerfield Conservation Commission strongly objects to the process of notification used, the onerous documentation provided, and the inadequate timeline for response afforded by the standard permitting process. We ask that Deerfield-specific data be supplied, and the time to respond be extended. We understand that a number of conservation commissions have contacted the NH Association of Conservation Commissions (NHACC) with similar concerns, and therefore additionally request that the SEC work with the NHACC to find a more viable way of obtaining conservation commission input.

Thank you.


Deerfield Conservation Commission



Katherine Hartnett
Interim Chairperson

CC: Board of Selectmen – Town of Deerfield
Planning Board – Town of Deerfield
Nicholas Coates, Executive Director – NH Assoc. of Conservation Commissions
Thomas Burack, Commissioner - NH Dept. of Environmental Services
Jeanne Menard – Deerfield Select Board Northern Pass Liaison
The Forum

Erick Berglund Jr

 Sun, Jan 10, 2016 at 3:58 PM

<erickb@metrocast.net>

To: Kate Hartnett <nhkate98@gmail.com>

[Reply](#) | [Reply to all](#) | [Forward](#) | [Print](#) | [Delete](#) | [Show original](#)

Hi K,

In the winter of 2002-2003 PSNH carried out a reconstruction of the 115kV transmission line #G146 which runs over our land. They had a major problem while pulling the replacement line through they pulled over one of the poles in our wetland. Panic ensued resulting in the dispensing of a large tracked vehicle into the wetland to get over to the fallen pole. Also, a helicopter with concerned project people flew in and landed in our field. The images document the story. The damage to the wetland is very evident. The last image shows the disturbance/damage created on the relatively firm ground of the cow lane to the ROW field by the tracked vehicle. Impact in the wetland was certainly more severe.

How does this relate to NPT? This reconstruction was a minute project compared to what NPT wants to do. The NPT project will move line #G146 to the north and closer to the northern most line in the ROW. This will result in major adverse impacts than in 2002-2003 when they replaced the poles in the same line. NPT will create a new line of poles inserted in previously relatively undisturbed wetland. Additionally, NPT will install massive steel towers across this space. This wetland is home to Blanding's turtles and northern water snakes as well as other wetland creatures. I doubt this wetland can survive the chaos if NPT is approved.

Erick



**Public Service
of New
Hampshire**

780 No. Commercial Street, Manchester, NH 02101

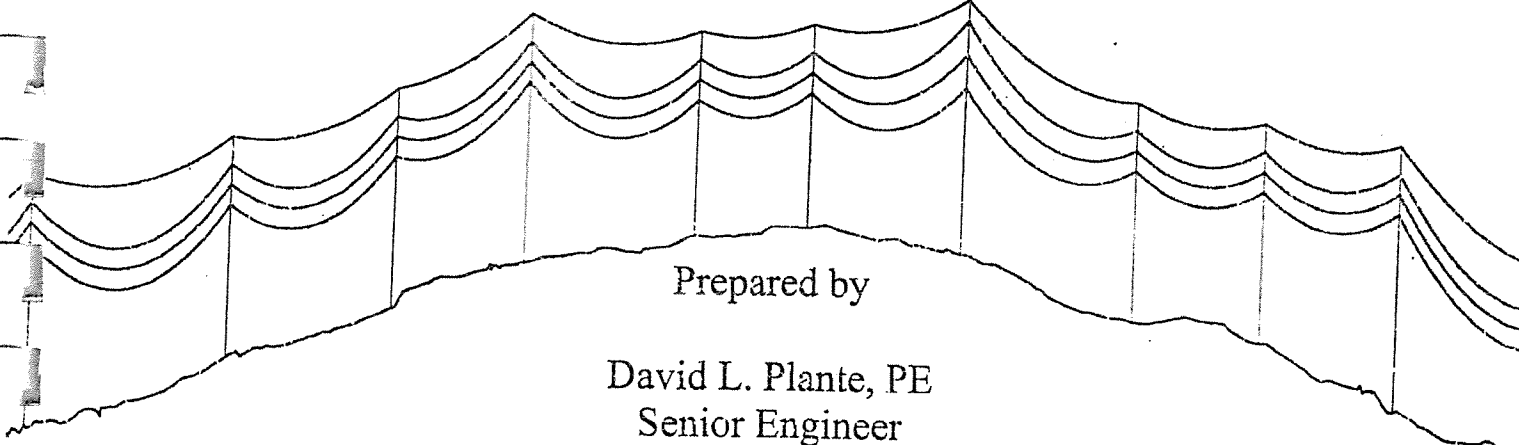
Public Service of New Hampshire
P.O. Box 330
Manchester, NH 03105-0330
(603) 669-4000

**Reconstruction of 115kV Transmission Line #G146
Deerfield Substation, Deerfield, NH
to
Garvins Substation, Bow, NH**

Application for Review
by
Deerfield Conservation Commission

and

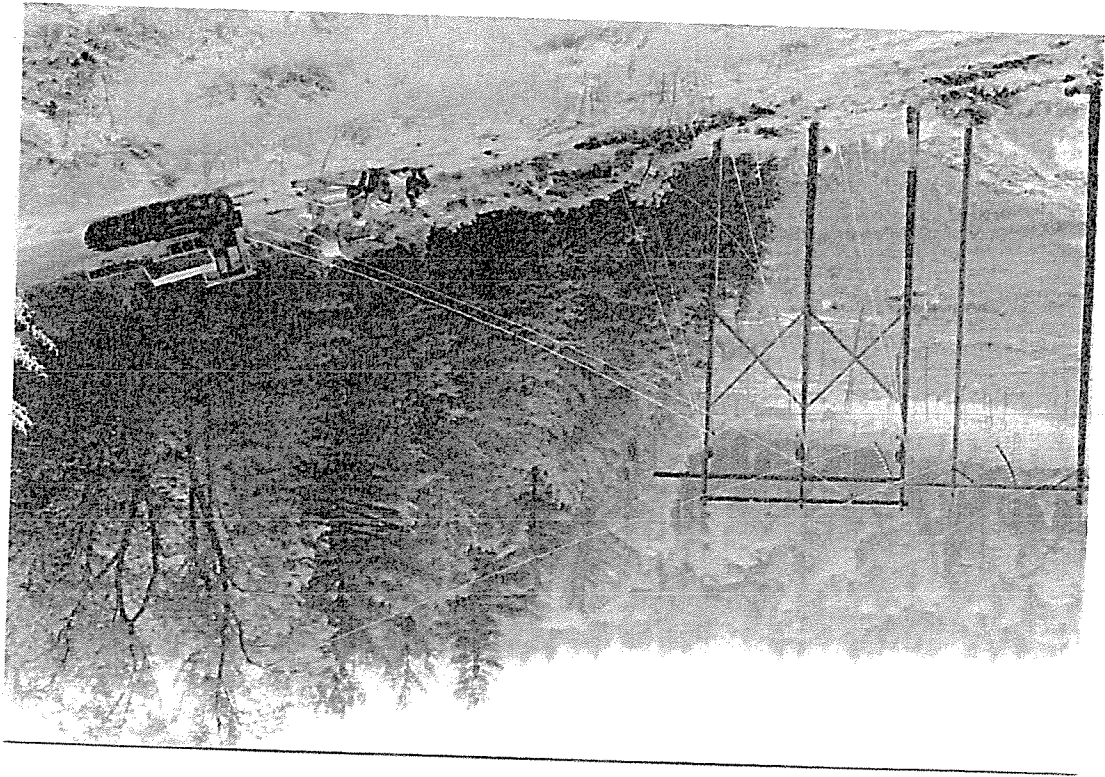
Minimum Impact Expedited Application
for review by
NH Department of Environmental Services
Wetlands Bureau



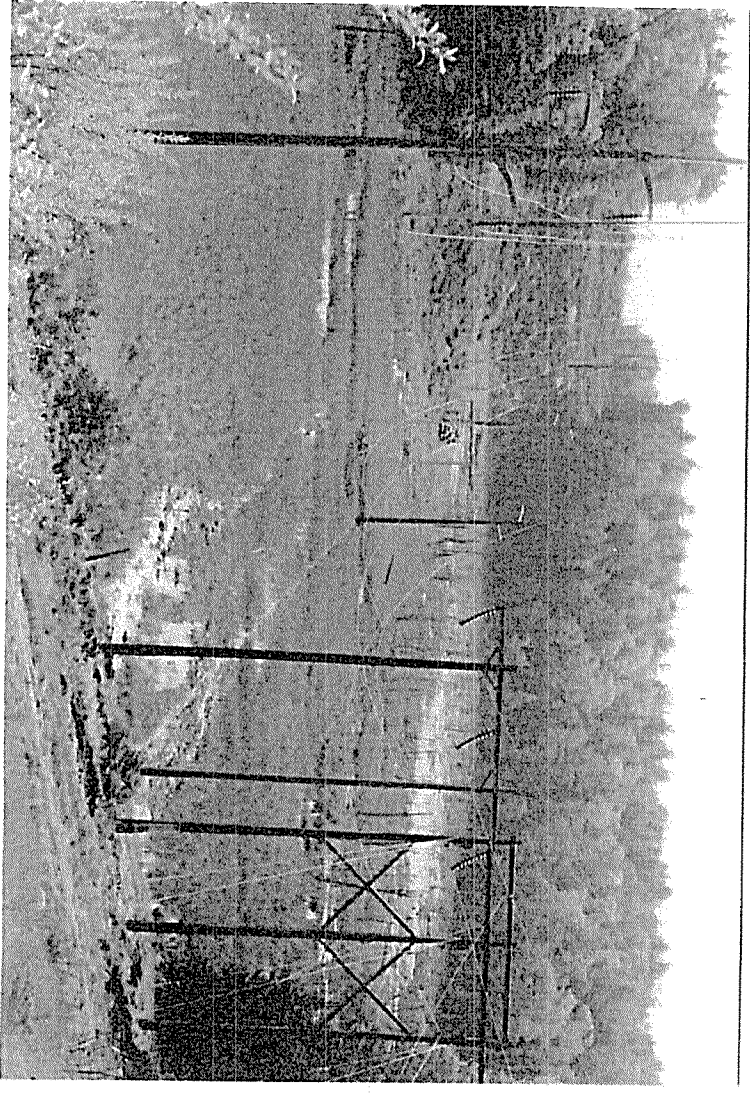
Prepared by

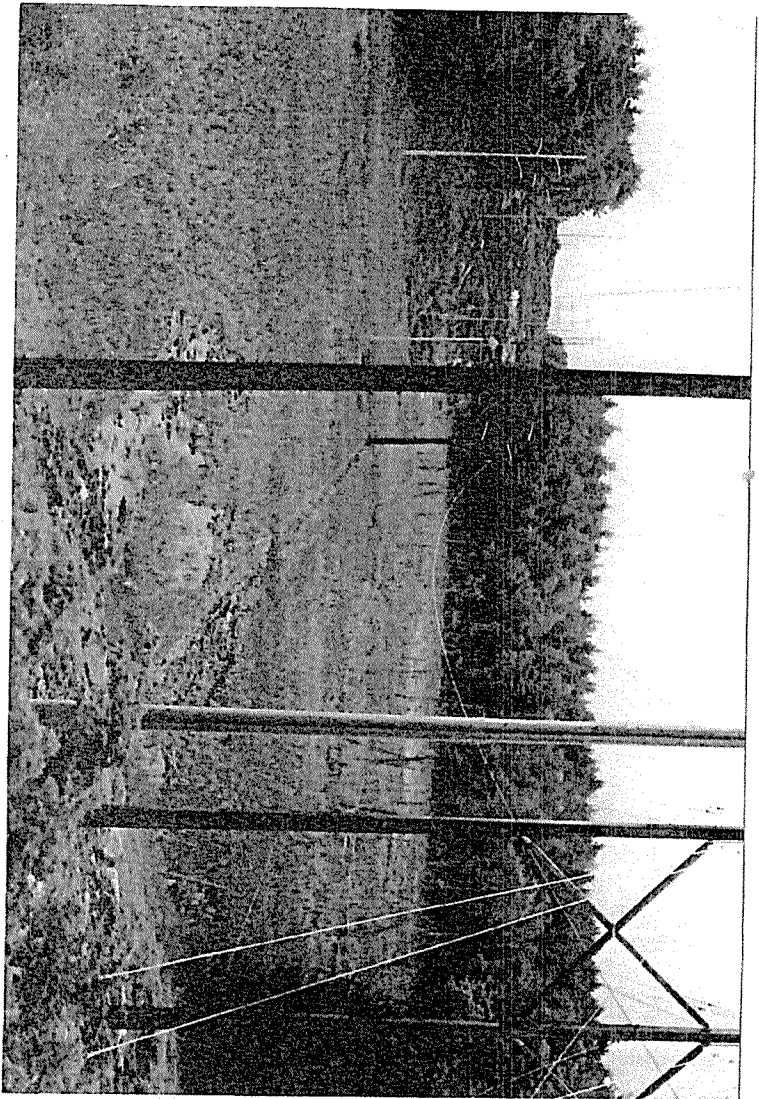
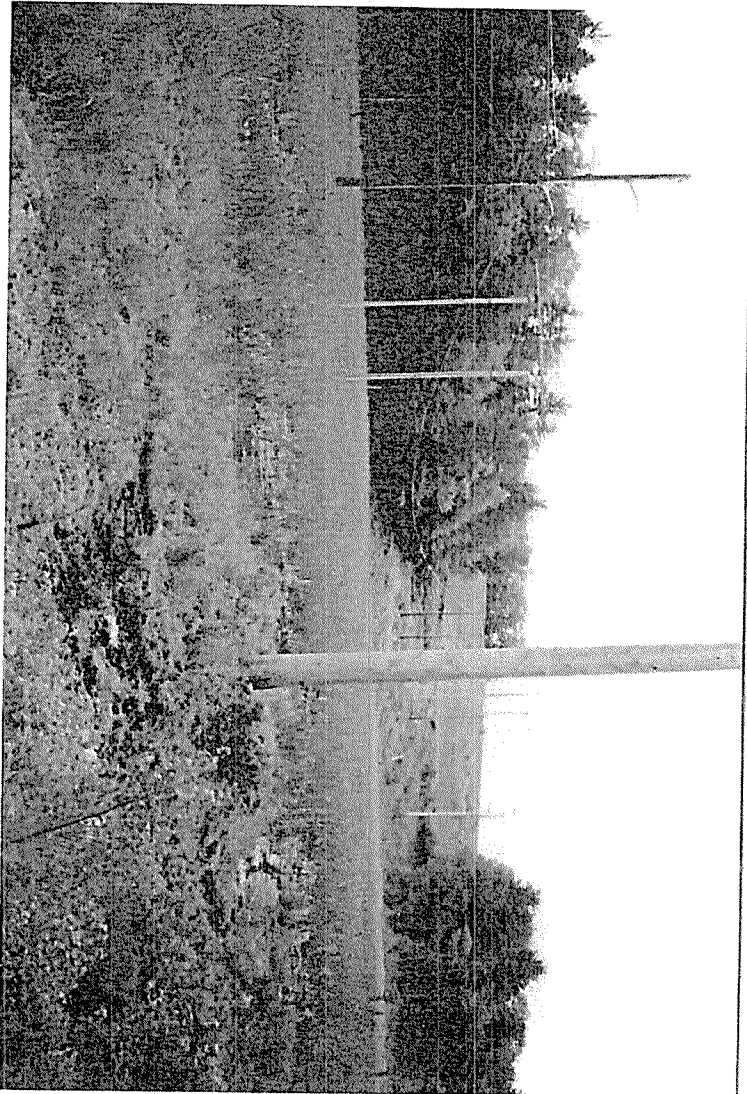
David L. Plante, PE
Senior Engineer
Transmission Line Engineering Department

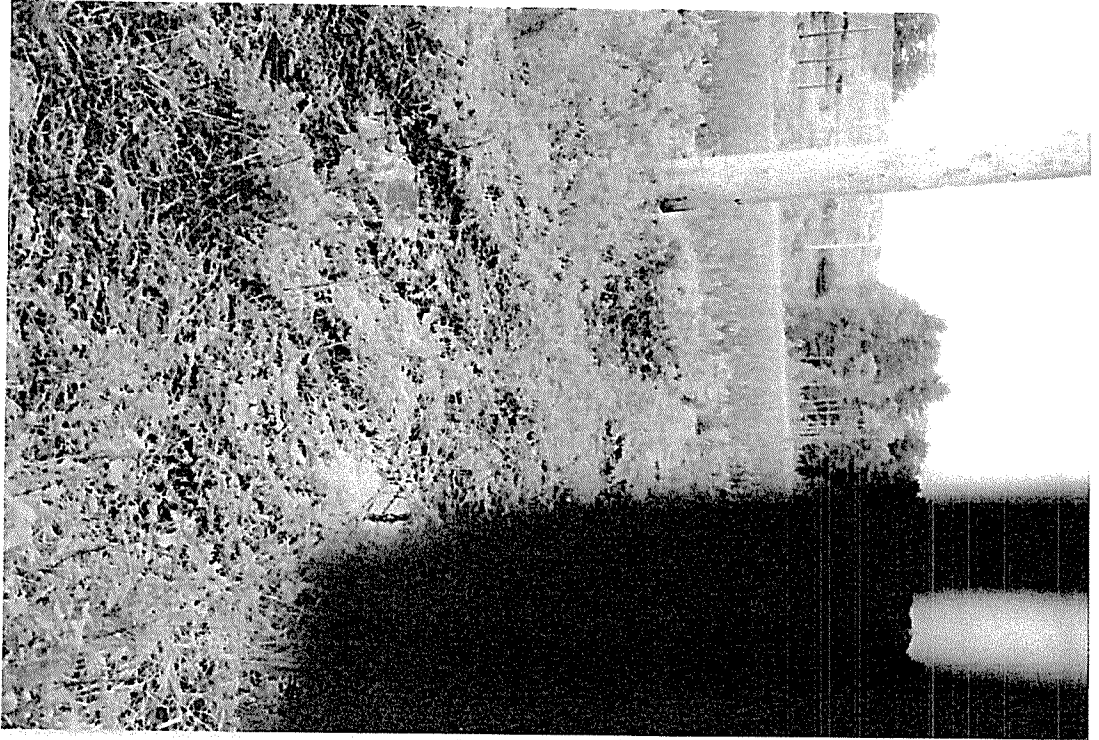
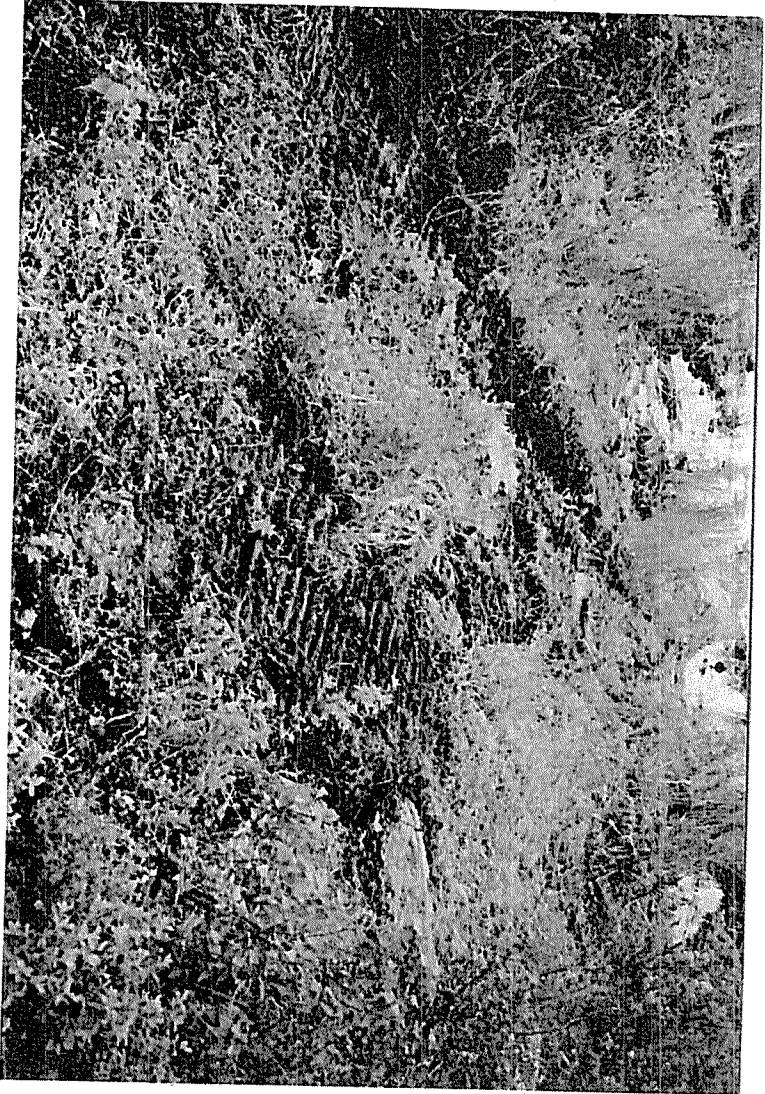
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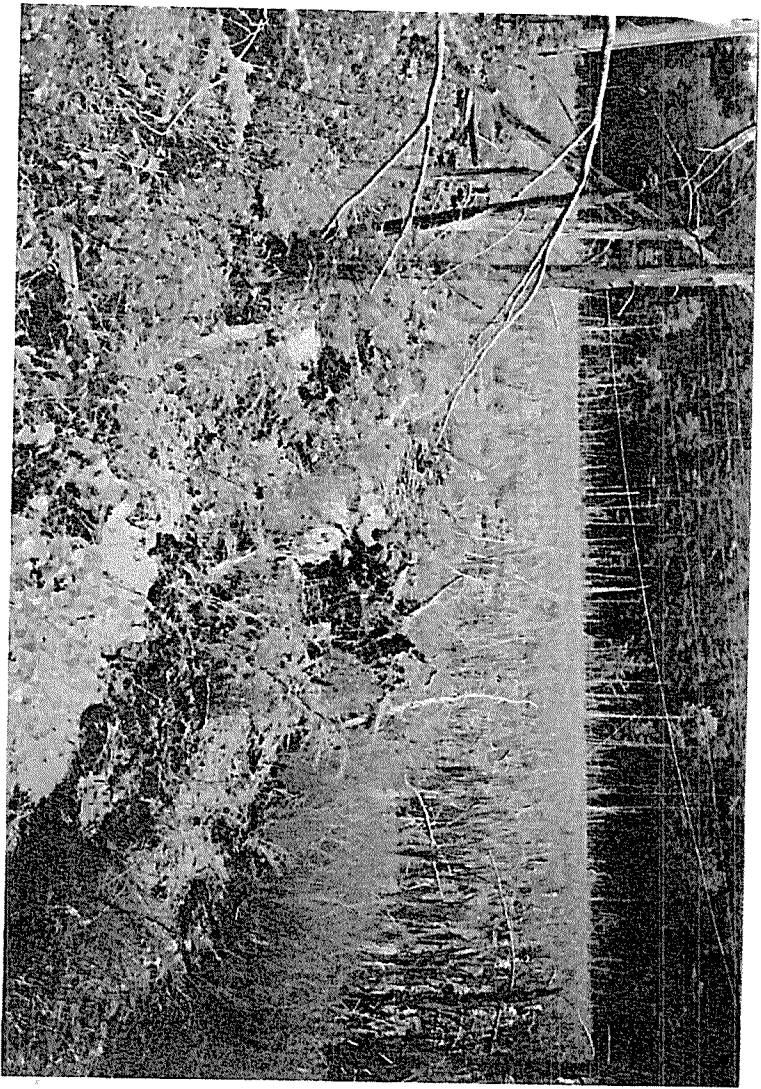
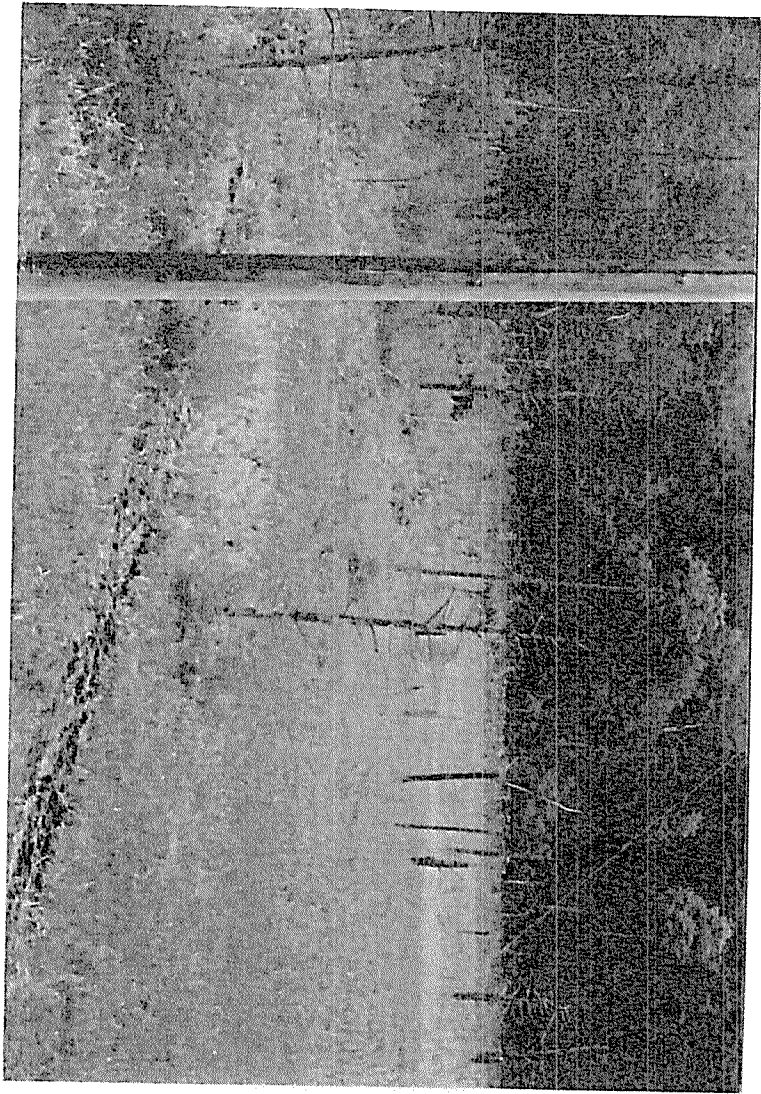
(1)



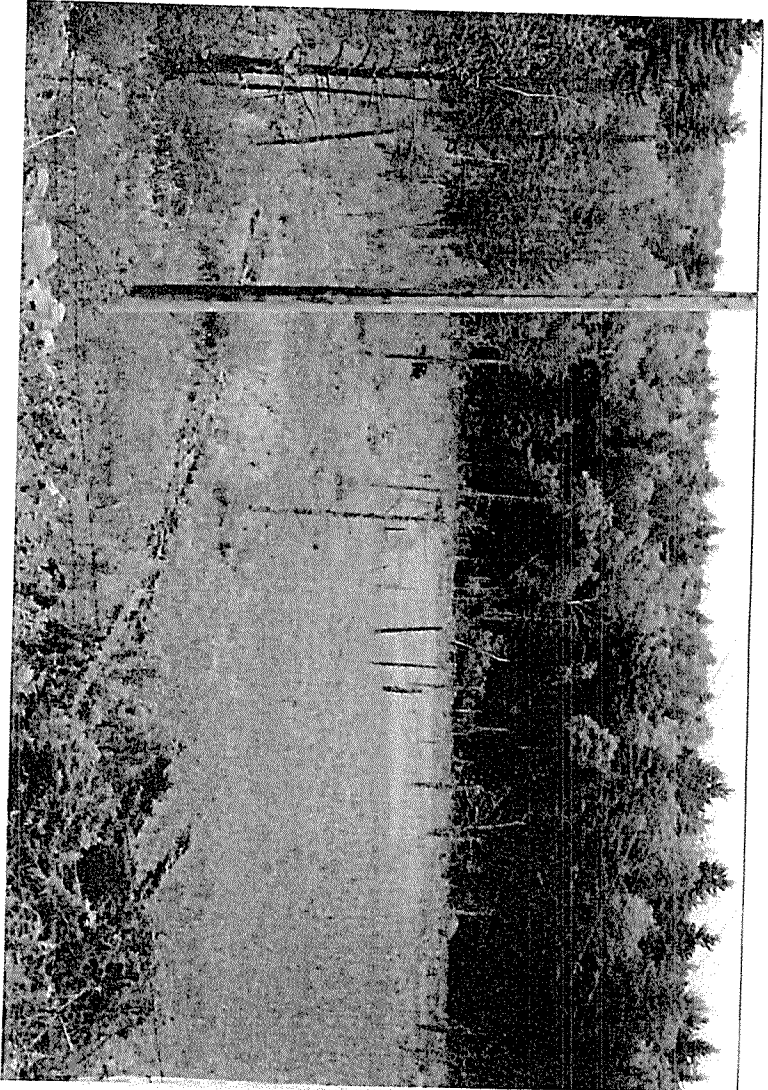
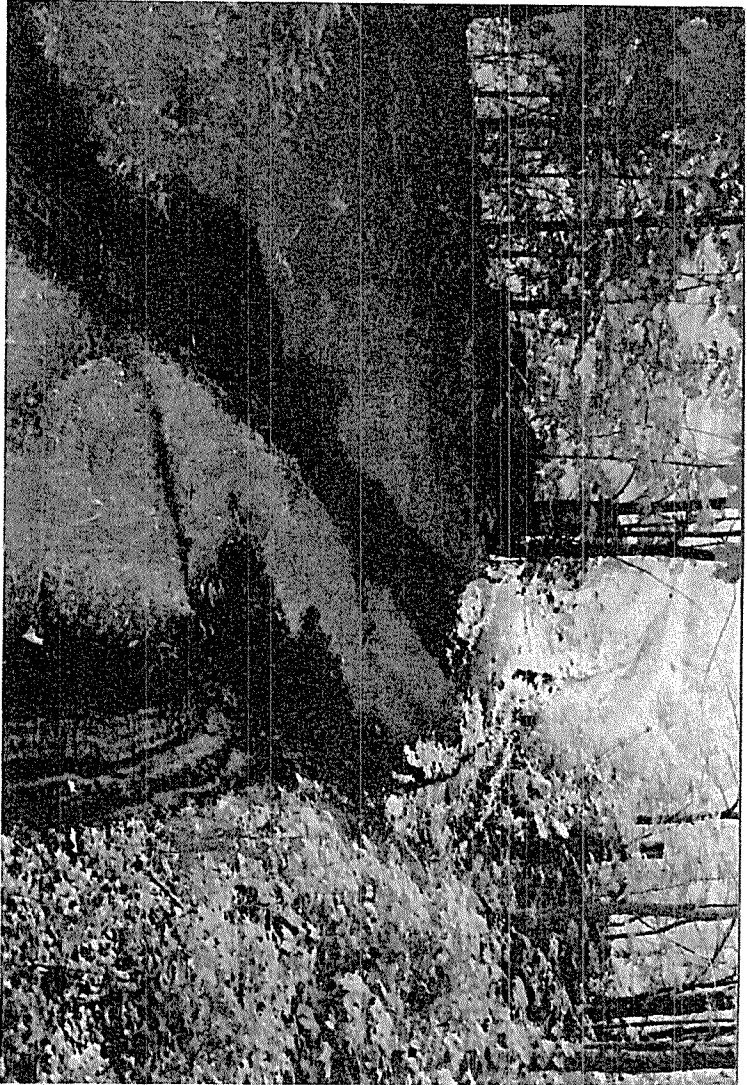




(14)



(B)



Christmas Tree and Garland Businesses

Separate from natural resources, but another important consideration was discovered during the November 24, 2015 field work. Elise and John met two separate Christmas tree managers. They were working within the existing ROW cutting balsam fir trees and bows for sale. These products were selling as far south as Florida. One man discussed that he had been managing Christmas trees under the powerlines for nearly 15 years. He spends the summer and fall trimming, and then has a busy November and December cutting trees and bows for sale. He was concerned about his business with the construction of Northern Pass, which would run directly through the trees.

CONCLUSION

Based on our recent and past fieldwork in Bethlehem, and GIS analyses, we believe there could be substantial negative impacts from proposed construction along the transmission line ROW through Bethlehem, New Hampshire. The extent of the negative impact on all types of wetlands and vernal pools cannot be determined without comprehensive studies to provide science based data on several environmental components that make up the rich diverse matrix of the area. Because the project is so extensive throughout the North Country, the cumulative effects of this work could be quite detrimental to wetlands, wildlife habitat and wildlife movements. If the project moves forward, at minimum, there should be careful monitoring by a biologist to ensure best management practices. The monitoring should continue for at least 3 to 5 growing seasons until the area has stabilized with a goal of revegetation with native, non-invasive species, good water quality, and no erosion.

**Assessment of Transmission Line Proposal
on
Natural Resources within the northern half of
Bethlehem, New Hampshire**

December 2015



**Summary Report Prepared by:
Elise J. Lawson (#233) and John C. Severance (#240)
Certified Wetland Scientists
507 West Darling Hill Road
West Burke, VT 05871**