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Sent: 5/1/2016 3:01:38 P.M. Eastern Daylight Time

Subj: WetlandsPermitAppl Northern Pass,DES File No. 2015-2830, SECDocket No.2015-06

Dear Sirs:

Re: Wetlands Permit Application for Northern Pass, DES File No. 2015-2830 and SEC Docket No. 2015-06.

As you approach the May 15th deadline to provide the Site Evaluation Committee an interim report on your progress in reviewing the Wetlands and Alteration of Terrain permit applications, I would like to provide you with information from the testimony I presented to the SEC on March 14.

In brief, a major concern is over whether this application is truly complete, especially because temporary impacts from the staging areas, laydown areas and temporary access roads are not being accounted for in the applications now before you. The applications you are now reviewing are just one small part of this project so I don't understand, and I'm not the only one, how these applications could have been declared complete.

I know you are busy, but this project is very important to Bethlehem and other towns, so I hope you find time to read the information below. It is also attached.

Thank you,

Cheryl Jensen, Co-Chair, Bethlehem Conservation Commission (603-869-5453)

TESTIMONY FROM CHERYL JENSEN, CHAIR, BETHLEHEM CONSERVATION COMMISSION ON MONDAY, MARCH 14, 2016 BEFORE THE NH SITE EVALUATION COMMITTEE ON THE NORTHERN PASS PROJECT

As proposed in Bethlehem, the Project would include almost 5 miles of overhead transmission lines along the current Eversource right of way (ROW) through wetlands from the Whitefield/Bethlehem town line to Route 302 as well as Transition Station #5 across from Miller Pond aka Baker Brook Pond, where the lines will then be buried.

It will impact two important water bodies: The Ammonoosuc River and Miller Pond aka Baker Brook Pond.

The Ammonoosuc River is a NH Designated River, with special protection by the NH River Management and Protection Program under RSA 483. And I would like to mention that the Ammonoosuc River Local Advisory Committee opposes this project because of the negative impact on the river aesthetically, environmentally, and economically.¹

Baker Book Pond, the largest open water pond in the Town of Bethlehem at almost 18 acres, is subject to the Comprehensive Shoreland Protection Program.

We commissioned two certified wetlands scientists to look at the impact of this project on the wetlands in the current ROW and submitted their report to the Department of Environmental Services and the SEC.

The report is titled "Assessment of the Transmission Line Proposal on Natural Resources within the northern half of Bethlehem, New Hampshire."

I know you will read that report and the letter we submitted, which thoroughly outlines our concerns, but I want to call your attention to a few things in that report but some things that are not.

1) First, we believe the environmental impact of this project is being underestimated in several different ways and not just in Bethlehem.

a) One is that all the temporary impacts are not being accounted for.

Just one example is the area at Baker Brook Pond where I believe you stopped very briefly when you visited the Rocks last Monday. It's where Transition Station #5 is planned. The land there quickly drops away into a wetland. I talked to Eversource engineers and they said that area would have to be developed with "fill."

In the Stormwater Management Study² for that area it reads: "Filling these soils likely requires a permit from the New Hampshire Department of Environmental Services and the U.S. Army Corps of Engineers."

Yet no application has been submitted for dredging and filling. So how can we be looking at the full impact? And I think from that standpoint alone this application should never have been declared "complete."

b) Another way in which the impact is being underestimated is that temporary impacts from staging and laydown areas, as well as temporary access roads have not been included in the applications that have been submitted to the DES that we can see.

This is documented in two places³: One is the letter to the SEC, from Peter Roth, Counsel for the Public and the other is in pre-filed testimony of John Kayser, who is the Construction Project Manager.

Briefly, according to excerpts from Mr. Roth's letter: "The pre-filed testimony of Mr. Kayser indicates laydown areas can be up to fifty acres....Yet the testimony does not describe how many laydown areas are needed or where they will be located. The pre-

filed testimony ..states the information is not known at this time...Thus, for an unknown portion of the land that will be impacted by construction, which could be significant given the potential size of each laydown site, the Applicant is silent.”

c) And finally we say the impact is underestimated in Bethlehem because Northern Pass was constrained to mapping in the ROW because of property rights. Although the applicant purports to have a relatively small impact of 0.39 acres, this does not take into account the connectivity of wetlands, streams and rivers.

In existing ROW, the NP identified 55 wetlands, all of which are part of larger systems that extend far beyond the narrow ROW. Disrupting wetlands within the ROW will have negative implications far beyond those boundaries.

For example, our report identifies five “Wetland Concern Areas,” all of which involve potential adverse impacts to the Ammonoosuc because of impacts to streams which flow either directly or indirectly into it.

Bethlehem hopes you won't allow the destruction of valuable wetlands and adverse impacts on the Ammonoosuc River and Baker Brook Pond, merely so that a corporation based in Connecticut and Quebec can make money at the expense of our environment. This project simply is not needed and not worth the damage it will do along the way. Thank you for listening and happy reading.

FOOTNOTES AND CITATIONS:

¹ See its letter of 11-January-2016 to the SEC.

² Stormwater Management Study for Transition Station #5 there is a section, Appendix G, Site Specific Soil Survey Report for the Bethlehem Transition Station (TS5) on page 7. [FULL CITATION: **“Limitations to development within the site consist of moderately steep slope leading to a wetland to the north of the house. Course fragments within the C horizon can make the upland soils (the Udorthent) difficult to excavate without a properly sized machine. Hydric soils, consistent with wetlands, mapped as Peacham mucky peat, are also present on the north half of the parcel and present constraints to development. Filling these soils likely requires a permit from the New Hampshire Department of Environmental Services and the U.S. Army Corps of Engineers. Fill soils may need to be removed for proper foundation construction.**”

³ Letter of December 2, 2015, to the SEC, from Attorney Peter Roth, Counsel for the Public and in pre-filed testimony of Mr. John Kayser, who is the Construction Project Manager. Mr. Kayser's testimony, which was given as recently as October 16, 2015, starts on page 125.

