

From: Ammy Heiser [<mailto:harunga1@msn.com>]
Sent: Friday, May 13, 2016 1:17 PM
To: Rennie, Craig
Cc: Monroe, Pamela
Subject: Wetland File No. SEC -2-15-02817

Re: Wetland File No. SEC -2-15-02817
Northern Pass Transmission, LLC and Public Service Company of
New Hampshire d/b/a Eversource Energy
Request to Deny Wetlands Permit Application

Mr. Rennie,

The Pembroke Conservation Commission (PCC) held its regularly scheduled monthly meeting on Monday, May 9, 2016 and once again we discussed the impact that Northern Pass Transmission Project would have on our Town. The PCC unanimously voted to urge DES to deny the wetlands permit application for the Northern Pass Transmission Project. The Pembroke Conservation Commission have the following concerns:

There are 6.2 miles of 345 kV AC transmission line in the proposed project that passes through the Town of Pembroke. In addition to new overhead lines throughout that 6.2 mile area, there are estimated to be 54 new towers with a majority of those new structures proposed to be 130 feet in height, but ranging up to 145 feet in height. Additionally, approximately 31 115 kV towers are proposed to be relocated. Pembroke's Master Plan states that 73% of the citizens want to preserve and maintain the rural character of the Town. The PCC is also concerned that the project will negatively effect the Town's character and property values as a result of the overhead lines and supporting structures. The visual, audio, and possible electromagnetic-field impacts of 345 kV AC transmission lines and large supporting structures are also of particular worry. Mitigation for these impacts should be required as a condition for any Site Evaluation Committee approvals. The burial of the lines within the Town of Pembroke, as a mitigation measure, should be thoroughly explored.

Placement of these very high voltage lines will require site excavation, expansion of the existing right-of-way, and additional deforestation of the existing right-of-way. We are concerned that maintenance of an expanded right-of-way to accommodate Northern Pass will result in an increase in the direct application of herbicides in wetland areas. These chemicals are likely to be transmitted downstream to the detriment of aquatic organisms and existing and potential future water supplies.

Widening the ROW will also encourage more ATV traffic which has already proven to have a detrimental impact in Pembroke. ATVs have significantly increased soil compaction, erosion and siltation of wetlands and streams in Pembroke. These expanded ROWs will also cut off aquatic connectivity. There is also increased risk of the introduction of invasive species of flora and fauna.

Rick Van de Poll recently completed a Natural Resource Inventory for the Town of Pembroke. He concluded that Pembroke has one of the highest drainage densities, determined by the number of streams per square mile of land, in the state. Flowing waters are one of Pembroke's defining natural resources. 60% of our Town is bordered by a River, the Merrimack, Soucook and Suncook. Northern Pass will impact each of these rivers directly. The Merrimack River Basin study listed the Soucook River as a critical water resource area of regional significance. Bordering Pembroke is the Concord Pine Barrens area and the Soucook Kame Basin, both threatened by the Northern Pass Transmission Line.

The transmission line will cross more than 50 wetland units impacting approximately 132,451 square feet. Since Pembroke recently developed a Natural Resource Inventory for our Town, the goal is to have several of these important wetlands designated as prime wetlands in order to better protect them from future development. Two significant tributaries, which the PCC identified as top priority, are Ames Brook and Pettingill Brook and these are also within the ROW. There is concern about destabilizing stream banks which will cause sedimentation downstream. The construction within high quality wetlands threaten the ecosystems and cause deterioration of the wetland and the wildlife habitat.

Mitigation in these sensitive wetlands and stream crossings should be implemented to stabilize banks and enhance stream function. Culvert replacement should be considered as needed.

Pembroke derives its public-water supply from stream-side wells in the stratified-drift aquifers adjacent to its rivers. Two well heads which provide water to both Concord and Pembroke, are within this ROW. The ROW also passes through several aquifer protection zones. Pembroke has a high concentration of aquifers due to lower elevation and an increase of fluvial/ glacial deposits. Aquifers have been destroyed by environmental impacts and once contaminated cannot be restored. Contamination of our water is of utmost concern to the citizens of Pembroke. The PCC is responsible to insure our Town's natural resources are protected from development.

The major wetland function, support of wetland-dependent wildlife, will be adversely impacted by the new power-line towers and the corridor expansion. The wildlife species within the ROW in Pembroke which most assuredly will be negatively effected are: Northern Black Racer, Eastern Hognose Snake, Smooth Green Snake, Wood Turtle, Karner Blue Butterflies, Noctuid Moth, Graceful Clearwing, Spiny Oakworm, Frosted Elfin, Bald Eagle, Eastern Whip-Poor-Will, fishers, raccoons, squirrels, neotropical migrant passerines, terrestrial and vernal pool salamanders, and other species that are arboreal dependent. Many of these are federally or state threatened species. Habitat loss is the number one reason for species to decline. Displacement of wildlife during construction will likely cause further declines in the affected species. Snakes can be crushed, turtle nesting areas are within the ROW and disturbing and /or destroying their nests is probable.

Critical nesting areas should be avoided whenever possible. No construction should take place during breeding season. If wildlife is to be removed, then habitat suitability should be carefully determined. Avoidance is the preferred method.

A number of threatened and endangered plants are also within these ROWs. Wild Lupines, Blunt-Leaved Milkweed, Spiked Needlegrass, Branching Needlegrass, Fall Witchgrass, and Licorice Goldenrod will be impacted by this project. Here again, the PCC desires to protect our wildlife, flora and fauna and is opposed to projects which further threaten these.

There needs to be a mitigation plan for all of the above plants. Currently, there doesn't seem to be a plan for Licorice Goldenrod and Spiked Needlegrass. There is the assumption that they will re-establish themselves. Mitigation needs to be assured.

The majority of wetlands in Pembroke are forested wetlands. This project intends to do extensive tree clearing therefore converting forested to scrub-shrub wetlands. This effects water temperature and changes habitat. Tree canopy removal creates a thermal change.

On March 8, 2011 at Pembroke's Annual Town Meeting, Article 12 passed by an overwhelming majority and again on March 15, 2014 at the Town of Pembroke's Annual Town Meeting, Article 15 passed by an overwhelming majority. Both of these articles required the Town of Pembroke to state its opposition to any new overhead high voltage transmission lines within its borders and to manifest the Town's strong preference for the burial of such lines.

There have been numerous Public Hearings in Pembroke regarding NPT. At every Public Hearing there were large amounts of people in attendance, more than at any other Public Hearings throughout the years. People are very concerned about visual impacts, a decrease in property values, noise levels of the transmission lines, electromagnetic-field exposure as well as concerns about the natural resources impacted.

In closing, this wetlands permit application should have been town specific. It was a daunting task to find all of the information specific to Pembroke. The PCC is a volunteer board as in every town. It is too much to expect that volunteers can take the time needed to decipher all of the information included in this application.

Secondly, Conservation Commissions are given the job to encourage wetland permit applicants to exercise these 3 principles: avoidance, minimization and mitigation.

HB626 regarding transmission lines has been approved in the Senate and has been concurred in the House. When this bill passes then NPT can use the interstate system for underground collocation of major energy transmission lines.

The PCC asks the NH Department of Environmental Services to carefully consider the long term implications of the Northern Pass Transmission Project and deny the wetlands permit application as currently designed and further encourage NPT to bury the lines in the existing road right-of-ways therefore minimizing and avoiding many of the impacts to our Town as well as our State's wetlands and natural resources.

We request that you apprise us of any further information submitted to NH DES regarding this permit. The PCC reserves the right to comment further at a later date.

Sincerely,

Ammy Heiser
Chair of the Pembroke Conservation Commission