

Tel:
(603) 823-8017

Fax:
(603) 823-7780



Town of Easton
1060 Easton Valley Road
Easton, NH 03580

<http://townofeastonnh.org/>

July 18, 2016

Dear Mr. Keddell,

the Army Corps of Engineers is soliciting comments on the proposed Northern Pass (Eversource & Hydro-Quebec) transmission project. The Easton Conservation Commission submits the following:

The applicant's 404 application states that the project “will reduce wholesale power prices, reduce CO2 emissions, create jobs, provide important tax revenues to local municipalities, and provide multiple electrical system benefits while potentially offsetting or postponing fossil fuel generation and reducing New England's dependence on natural gas for power generation.”

None of these claims are objectively documented or guaranteed and we request that they be dismissed from any assessment the ACE may engage in.

The Section 404 permit site states: “The basic premise of the program is that no discharge of dredged or fill material may be permitted if: (1) a practicable alternative exists that is less damaging to the aquatic environment or (2) the nation’s waters would be significantly degraded. In other words, when you apply for a permit, you must first show that steps have been taken to avoid impacts to wetlands, streams and other aquatic resources; that potential impacts have been minimized; and that compensation will be provided for all remaining unavoidable impacts. “

Northern Pass rejected the least damaging alternative assessed in the Environmental Impact Statement; full burial. The New Hampshire legislature designated burial corridors for electrical infrastructure along highways which include Interstate 93, an already disturbed corridor which would also provide a shorter route than the proposed burial under routes 116, 112 and 3. In rejecting this route as well as rejecting burial under other roadways where the designated corridors are not practical, NPT has failed the first criteria, avoidance.

Waters in Easton could be degraded to a significant degree by this project. The proposed burial route is down a narrow valley road (Route 116) which is crossed in many locations by the feeder streams of the Ham Branch watershed, which flow from the Kinsman Range in White

Mountain National Forest, and the Cooley-Cole Ridge. The Ham Branch flows into the Gale River in Franconia, which flows to the Ammonoosuc which flows to the Connecticut. On Route 112 in Easton the route abuts the Wild Ammonoosuc River, fed by streams on the slopes of Mt. Moosilauke, Mt. Blue, and South Kinsman. NPT has provided inadequate data on burial methods and effects, such as potential for water movement through HDD locations and duct vaults.

Their data on boring soil disposal, monitoring, and sedimentation and pollutants that may be discharged into waterways by boring and blasting, is inadequate and indicates a similar unwillingness by the applicant to admit the damaging effects of the project. Only temporary watercourse impacts are listed, indicating that the miles of underground trenching and conduit in a valley transected by streams, are expected to have no effect on water movement, sedimentation and aquatic life.

The application also fails to address the aquifers that underlie a significant portion of the proposed burial route in Easton. It states: "Groundwater table depth within the Project area is typically 10–20 feet below the land surface, but does range from a few feet to several hundred feet deep. The water table fluctuation mirrors that of annual stream flow data with a high occurring in the spring and a low occurring in the late summer/early fall." They fail to explain how the HDD at up to 65' below the land surface will affect groundwater and aquifers, and how HDD will occur in the aquifer protection districts that exist in many towns, including Easton. The general reference to best management practices for aquifer protection is inadequate and only addresses above-ground practices.

No wetlands impacts are listed for Easton, though SEC application documents lists 38 wetlands along the burial route. It is unclear why these wetlands are not numbered sequentially, but intermittently, beginning with ETU1 and ending with ETU94.

We question why the cubic yards of discharged materials is not required to be disclosed in the application.

At a public meeting hosted by the Easton Conservation Commission, NPT representative stated that the burial route in Easton would be under the pavement, though they were aware the DOT standards would not permit this. At another public meeting with the SEC, Eversource rep. Dana Bisbee made statements about water that call into question NPT's commitment to honesty:

"Mr. Bisbee, can you tell me if you know how far away from the Project can the water supply be impacted?"

Mr. Bisbee: "It's going to depend on the circumstances. If there's no direct effect on wetland beyond where the work is taking place, if there were some anomaly that occurred during the work that caused some runoff, then it could go off site. But I can't give you a limit to that."

(pgs 402-403): http://www.nhsec.nh.gov/projects/2015-06/transcripts/2015-06_2016-04-12_transcript_pending_motions_lincoln.pdf)

The 404 application was signed in 2013, before the route was changed for the third time substituting 52 miles of boring and trenching along roadways for overland construction. This leaves unclear what other areas of the application may be outdated.

Though the application repeatedly refers to the project as 192 miles, NPT continues past Deerfield to Londonderry, another 30 miles, as indicated in project documents and the 404 application below. The towns south of Deerfield; Raymond, Chester, Derry, Candia, Auburn and Londonderry are not on the Northern Pass website, leaving residents hobbled in finding information about proposed plans for their towns and commenting to ACE and other agencies. The end point of Londonderry also makes clear the greatly lowered impact of burial of the project along 93 continuing to Londonderry, 13 miles shorter than the proposed overhead route (24 vs. 37 miles) a route that was inexplicably not assessed in the EIS

ROCKINGHAM COUNTY		
DEERFIELD	North Branch River	LONDONDERRY
Hartford Brook	CHESTER	Beaver Brook
Lamprey River	Preston Brook	Shields Brook
Nicholls Brook	DERRY	
RAYMOND	Beaver Brook	
Fordway Brook	Shields Brook	

The list of abutters to the project lists none in Raymond, Chester or Derry and only one in Londonderry.

In addition, it appears NPT may necessitate construction/upgrades between Scobie Pond/Londonderry and Tewksbury, which have not been addressed at all in the EIS or the 404 application:

“Question/Comment 1: **Consulting Party asked whether work would be done beyond the Scobie Pond Substation, to the Lawrence Road Substation. Answer/Response 1: DOE said yes.** NPT added that, as described in NPT’s NH SEC application, the upgrade work would be between the Deerfield and Scobie Pond Substations and that approximately 10 structures (e.g., towers) would have a new height 5 feet higher (on average) than the current structures. NPT also explained that it was waiting for additional information through the ISO-NE process to inform any additional upgrade work, but that NPT did not expect any significant impacts as a result of this work. 🖨️

Question/Comment 2: Consulting Party asked for confirmation that there would be changes between the Scobie Pond Substation and the Lawrence Road Substation. Answer/Response 2: DOE explained that it was looking at the details of the upgrades and that additional work could be performed between the Scobie Pond Substation and the Lawrence Road Substation and that DOE would work to address the latest information that NPT provides to DOE. NPT added that they are still waiting to hear from ISO-NE regarding the final needs to upgrade existing

facilities in the southern tip.”

(Northern Pass Section 106 (Historical Review by DOE as part of Presidential Permit) Conference call notes, June 20, 2016, available on the Section 106 consulting party site.)

The 404 application states:

“Discharges to, and fills within, waters of the U.S. will typically result from the following types of Project activities:

- the temporary use of access routes across wetlands and watercourses (in order to complete the required vegetation clearing and removal);
- the improvement of existing access roads and the installation of new access roads across wetlands and watercourses (to provide ingress and egress to transmission line structure sites and other work areas along the ROWs);
- the installation of “work pads” (e.g., crane pads, pulling pads, and guard pads) required to safely support and stage construction equipment needed to remove and relocate existing transmission and distribution structures, install new transmission structures, install and remove guard structures, and perform conductor stringing and pulling operations.”

The applicant, states that they possess three unspecified laydown locations, leaving their ability to acquire the necessary property to construct the project unproven and the potential impacts of the use of the properties, if acquired, unknown.

For burial the applicant failed to correctly map the easement width of the road in Easton and has failed to respond to documentation submitted indicating narrower easement widths.

The application states: “HDD construction will begin with establishing an electronic positioning sensor system. The crews will set up drill equipment including drill rig, mud mixer/reclaimer, pumps, miscellaneous support equipment, loaders, boom trucks and control booth.”

In many locations in Easton houses, streams, steep slopes and stone walls are quite close to the road, having adverse possession and leaving it unclear how such construction could proceed here.

The application states:

“To the extent practicable, on-ROW and off-ROW access roads proposed for use during Project construction will follow existing access roads or trails already present and generally visible on aerial photographs. These are also noted on the project permitting plans.”

Yet many of these “access roads or trails” are just that; barely used tracks passable by ATV or

game trails. They are not legal vehicle access, have not been used as such, nor are they suitable for heavy equipment or even truck access without considerable excavation, fill and damage.

This is just a small sampling of the questions and concerns we have with the applicant's proposal as described in its 512 page application, which three of the Easton Conservation Commission members were unable to download from the SEC site.

We request that the Army Corps of Engineers reject the application due to the failure of the applicant to meet the requirements for avoidance and minimization outlined in the 404 requirements, the potential damages of the proposed route, and the myriad inaccuracies and incomplete nature of the information submitted by the applicant.

Sincerely,

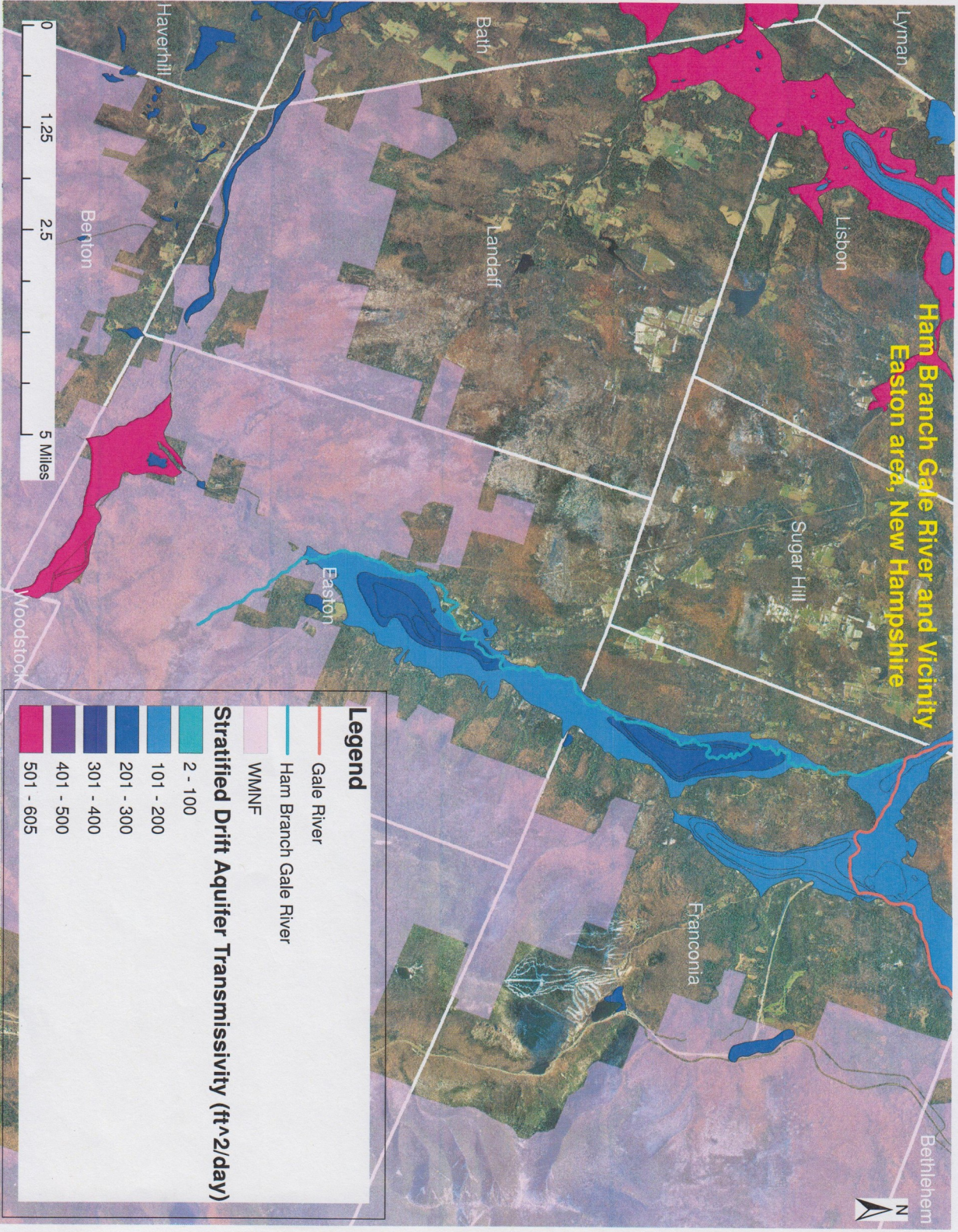
Easton Conservation Commission

Kris Pastoriza, Chair
Deb Stever
Carl Lakes
Finn Goodwin
Steve Sabre
Roy Stever

Conservation lands



Ham Branch Gale River and Vicinity Easton area, New Hampshire



Legend

- Gale River
- Ham Branch Gale River
- WMNRF

Stratified Drift Aquifer Transmissivity (ft²/day)

- 2 - 100
- 101 - 200
- 201 - 300
- 301 - 400
- 401 - 500
- 501 - 605