



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