

Ammonoosuc River Local Advisory Committee - 95 Dodge Rd. Littleton, NH 03561
(603) 444-2398 squarepeg@worldsurfer.net

October 7, 2013

Brian Mills, Senior Planning Advisor
Office of Electrical and Energy Reliability (OE-20)
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Dear Brian Mills:

Under RSA 483: The Ammonoosuc River is a NH Designated River protected in the NH River Management and Protection Program (NH RMPP). Ammonoosuc is an Abenaki word for "Fish Place." The Local River Management Advisory Committee (LAC), comprised of appointed representatives from each of the seven river corridor towns, is responsible for reviewing and commenting on activities, requiring state or federal permits that would alter the resource values and characteristics for which the river was designated.

The Ammonoosuc River's 4th order status, as well as its protection under the NH RMPP, establishes specific additional protection under NH state law RSA 483-B Shoreland Water Quality Protection Act:

483-B: Purpose. The general court finds that:

I. The shorelands of the state are among its most valuable and fragile natural resources and their protection is essential to maintain the integrity of the public waters.

I-a. A natural woodland buffer, consisting of trees and other vegetation located in areas adjoining public waters, functions to intercept surface runoff, wastewater, subsurface flow, and deeper groundwater flows from upland sources and to remove or minimize the effects of nutrients, sediment, organic matter, pesticides, and other pollutants and to moderate the temperature of the near-shore waters.

I-b. Scientific evidence has confirmed that even small areas of impervious surface coverage can have deleterious impacts on water quality and the aesthetic beauty of our lakes and rivers if not properly contained or managed within each watershed. These impacts are known to reduce recreational opportunity, reduce property values, and pose human health risks.

II. The public waters of New Hampshire are valuable resources held in trust by the state. The state has an interest in protecting those waters and has the jurisdiction to control the use of the public waters and the adjacent shoreland for the greatest public benefit.

III. There is great concern throughout the state relating to the utilization, protection, restoration and preservation of shorelands because of their effect on state waters.

IV. Under current law the potential exists for uncoordinated, unplanned and piecemeal development along the state's shorelines, which could result in significant negative impacts on the public waters of New Hampshire.

The route for the proposed Northern Pass HV/DC Transmission Project depicted in a map dated August 30th, 2013 indicates the proposed route for the transmission line crosses the Ammonoosuc River in Bethlehem. This stretch of the Ammonoosuc River is classified in the designation status as "rural river," under RSA 483: Rural rivers are adjacent to lands partially or predominately used for agriculture, forest management, and dispersed or clustered residences. "The Management of rural rivers and segments shall maintain and enhance the natural, scenic and recreational values of the river and shall consider, protect and ensure the rights of riparian

owners to use the river for agricultural, forest management, public water supply, and other purposes which are compatible with the instream public uses of the river and the management and protection of the resources for which the river or segment is designated." Additionally, the adjacent Wing Road section of the Ammonoosuc River is a well-known popular rainbow trout, brown trout, and native brook trout destination for fishermen. "The State of NH has an interest in protecting special places like this and has the jurisdiction to control the use of the public waters and the adjacent shoreland for the greatest public benefit."

After additional review and discussion, the Ammonoosuc River LAC is concerned about impacts of the HV/DC transmission line project in the immediate vicinity of the protected and designated Ammonoosuc River, as well as the projects threat of cumulative impacts to the Ammonoosuc River watershed. We feel the disturbance from this project, as proposed, threatens the values and characteristics for which the river was designated. We also had citizens of the town of Bethlehem come to our October 2, 2013 meeting to specifically express their concerns about this project and its potential to have negative impact on the river.

The Ammonoosuc River LAC submitted a letter to you on April 7, 2011 expressing concerns with this proposed project. What we said then regarding the Northern Pass transmission project's potential impact on water quality and water quantity in the North Country remains the same today. We believe today, as we did then, that this proposed project has the potential to threaten the Ammonoosuc River's natural, scenic, recreational and community values for which the river was designated. The Ammonoosuc River is the public's trust. It is our understanding that in order for a Presidential Permit to be issued for a transmission line, the proposed facility or project must be found to be consistent with the public's interest. At this point in the process we strongly believe the project, as proposed, will diminish the values and characteristics for which the river was designated and jeopardize its status under RSA 483.

Although we are very interested in reviewing the environmental impact data that will be forthcoming and engaging in the SEC process, we believe this project, as proposed, will have negative impact on the Ammonoosuc River which belongs to the public's trust. We therefore at this time ask that the Department of Energy deny the request for a Presidential Permit.

Respectfully submitted,



Charlie Ryan, Chairman
Ammonoosuc River Local Advisory Committee

cc:
Governor Maggie Hassan
Ray Burton, Executive Councilor
Thomas Burack, Commissioner NHDES, SEC Chair
Jacquie Colburn, NH River Coordinator
Michele Tremblay, NH Rivers Council
Bethlehem Board of Selectman
Bethlehem Conservation Commission

From: Connie McDade <cmcdade@roadrunner.com>
Subject: **Question regarding website.**
Date: October 9, 2013 1:19:15 PM EDT
To: webmaster@northernpasseis.us

To Attention of the Webmaster:

I submitted a message in the comment box and a two-page letter in the attachments for the Northern Pass HV/DC Transmission Project on behalf of the Ammonoosuc River Local Advisory Committee in NH a little after the noon hour today, October 9. After clicking submit, I received a dialog box message "Oops, server issue. We are working on that now." Please advise, did the 2 pages of the letter, comment, and other identifying info go through to be received at your end? Let me know if we need to resubmit. Thanks.

Connie McDade, Secretary
Ammonoosuc River Local Advisory Committee