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From: Linda Hansen <eastonconservationcommission@gmail.com>
Sent: Tuesday, February 27, 2024 1:58 PM
To: DES: Land Resources Management
Subject: Request for a 40-day extension for comment on Eversource's X-178 Wetlands Permit Application

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Dear NHDES,

Please forward the following letter to the NHDES agent reviewing Eversource's X-178 Asset Condition line Wetlands Permit Application. In your response, we would appreciate knowing the name of the agent in charge of this review and the NHDES file number for future reference.

The Easton Conservation Commission (E.C.C.) would like to request a 40-day extension to your Wetlands Permit Application deadline for the Eversource X-178 Asset Condition line replacement in Easton, NH for the following reasons:

- 1) As of the end of February, there is still snow and ice covering the right of way preventing members of the E.C.C. or any certified specialists from viewing the extent of the wetlands that will be impacted by the proposed construction and assessing the nature of that impact.
- 2) We would like NHDES to consider the size and scope of this project. Eversource's X-178 Asset Condition project passes 7 miles through the Town of Easton. At 16' wide, this project represents 591,360 square feet of impact, not including passing zones, turn-around spurs, staging areas, etc. This is more than 15 acres of permanently compacted soils which will alter water retention, filtration, erosion, sedimentation, and flooding risks.
- 2) Page 2 of Eversource's wetland application to NHDES asks, "Is there potential to impact impaired waters, class A waters, or outstanding resource waters?" with this construction project, and Eversource's response is "Yes." The citizens of Easton value their water resources. There is no public water supply in Easton. Every household relies on a private well that is recharged through our surface waters. Easton (along with Jackson, NH) has the least surface water of any town in New Hampshire. We have no lakes or ponds and no rivers. We rely on our surface streams and runoff to recharge our citizen's wells. We take ANY impact on these surface waters seriously.
- 3) The wetlands application to NHDES from Eversource on their right-of-way says that there are protected species or habitats for "High-Elevation Spruce-Fir Forest and Wood Turtle" (page 1). However, we have some evidence of the existence of New England cottontail, Canada lynx, Northern long-eared bat, and marbled salamanders, all endangered species in the state of New Hampshire, in the vicinity of Eversource's right-of-way in Easton. We want more time to document the existence of these species in the area and ensure their safety during any planned construction.

3) During Eversource's public meeting in the town of Easton sponsored by the E.C.C., Eversource representatives spoke about sections of their right-of-way having to be covered by a "permanent" gravel road for construction and future maintenance purposes; however, their wetlands application to NHDES (page 2) says "temporary grading is required on steep slope wetlands to provide safe access and work pad areas." We want clarification. Are the roads Eversource plans to build "permanent" or "temporary"? If "temporary," how is that accomplished? Can one remove a gravel road traveled by heavy construction trucks once it is implemented?

In summary, the E.C.C. would like to request an extension of another 40 days beyond the current 14-day deadline from the Town Clerk's signature on February 22, 2024, so that we can visit and assess the site and the impact of the proposed construction when the snow has melted and the water is flowing at its fullest extent.

Respectfully submitted,
Easton Conservation Commission
Easton, NH