

Comment to Forest Service on Eversource S-136 rebuild:

October 1, 2023

The Forest Service decision memo on the S-136 rebuild states:

“The purpose of the project is to promote public safety, provide adequate public service, and ensure the safe and continuous operation of the line.”

Is the Forest Service aware that none of the Eversource Asset Condition line rebuilds (S-136, O-154, B-112 or X-178) have been determined necessary for system reliability, nor has Eversource provided any pole reports documenting that the existing structures were/are not sound?

[https://nhconservation.org/lib/exe/fetch.php?
media=undefined:synapse_on_asset_condition_5_2023.pdf](https://nhconservation.org/lib/exe/fetch.php?media=undefined:synapse_on_asset_condition_5_2023.pdf)

<https://www.nhbr.com/opinion-northern-pass-lite-phase-i/>

The application for the S-136 line stated that new structures and Optical Ground Wire (OPGW) would be installed but the conductor would remain at 795 ASCR.

"The existing static wire will be replaced with optical ground wire in all crossing locations. No conductor, shield wire, or neutral wire will be added or replaced as part of the structure replacements; instead, existing conductors and wires will be transferred to the newly constructed steel support structures."

<https://nhconservation.org/lib/exe/fetch.php?media=de-19-162.pdf>

The conductor that is on the new structures now has ten insulators, compared to the nine insulators on the 1272 ACCS conductor that was placed on the new steel O-154. Does it make sense for Eversource to go through the massive construction, terrain alteration, gravel and rip-rap bermed construction pads and gravel roads while leaving the conductor at 795?

Has the FS checked to confirm the size of the conductor that is on the line now?

The Forest Service permit states

“Project Design Features The following project-specific measures to avoid or minimize potential impacts to key resources shall be implemented as part of this project.

- The project proponent would obtain the required federal, state, and/or local permits prior to implementing activities in jurisdictional wetland or other waters of the United States."

[https://nhconservation.org/lib/exe/fetch.php?
media=decision_memo_eversource_s136_line_structure_and_optical_ground_wire_replacement_project.pdf](https://nhconservation.org/lib/exe/fetch.php?media=decision_memo_eversource_s136_line_structure_and_optical_ground_wire_replacement_project.pdf)

I am unable to find a SWPP (Stormwater Prevention Plan) as required by the Clean Water Act., for this project.

The Forest Service permit states

"This action is categorically excluded from documentation in an environmental impact statement (EIS) or environmental assessment (EA). The action is a routine activity within the following category of exclusion found at 36 CFR 220.6(e)(2), additional construction or reconstruction of existing telephone or utility lines in a designated corridor. This category of action is applicable because the proposed project involves reconstructing an existing utility transmission line by replacing poles and wires in a designated corridor."

Did this assessment take into account the removal of native topsoil and replacement with gravel and rip-rap, which is permanent in the area of the roads and the 100' x 100' construction pads?

Did this assessment take into account that the "restoration" of the construction pads from 100' x 100' down to 30' x 60' did not involve removal of the gravel and rip-rap, but shoving of topsoil over the edges of the construction pads?

The structures were replaced using unnecessarily invasive construction methods that have permanently altered and industrialized the terrain. It has the character of a vacant lot, but it in many locations is very difficult to walk on because of the rip-rap, which creates hazardous and unstable footing, more so when raspberries and other growth cover it.



Above: This rip-rap construction pad berm abuts a stream, making access to that stream treacherous and unpleasant. What justification is there for rip-rap to be left alongside a stream in WMNF, when the transmission line terrain was close to natural for more than fifty years and Eversource failed to provide evidence of need for new structures, thus need for any construction?



Was USFS consulted in regards to the waiver DES incorporated in its permit to Eversource?

“As part of the processing of this application, DES granted approval to waiving specific requirements of: Env-Wq 1504.09, finding that the development of a stormwater drainage report, and associated drainage area plans and hydrologic soil group plans was not warranted given the scope of the project and its linear nature. It was further determined that granting the waiver would not have an adverse impact on the environment, public health, public safety, or abutting properties, and that granting the request is consistent with the intent and purpose of the rule waived.”

Are we to believe the gravel road and constructions pads have the same water absorbing capacity as the former natural terrain, and that the flat roads and constructions pads to not alter water flow on the terrain, especially in steep areas?



Left: rebuilt
S-136 line
795 ASCR
conductor
10 insulators



Right: X-178
line, not
rebuilt,
795 ASCR
conductor, 7
insulators.
Insulators and

crossbars were replaced in 2017.

Below: O-154 rebuilt line, 1272 ACCS conductor, 9 insulators



Below: There was no need for White Mountain National Forest to be damaged like this, when the Forest Service could simply have required Eversource to show that ISO-NE had determined the reliability need of complete structure replacement, and that the pole inspection reports showed that a complete rebuild was necessary and more cost-effective than replacement of a few poles and/or reinforcement of others.

Why did the Forest Service not require proof of the claimed condition of the structures? And isn't it obvious that the roads and construction pads indicate that Eversource plans to return and expand the line?



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