

October 21, 2019

Jeffrey Blecharczyk
Land Resources Management Program
Department of Environmental Services
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

Sent via e-mail to: Jeffrey.Blecharczyk@des.nh.gov

Mr. Blecharczyk:

This letter has been prepared on behalf of Antrim Wind Energy LLC (Antrim Wind) in response to your letter dated September 10, 2019 and received on September 11, 2019. In the letter, NHDES summarized their observations from a July 26, 2019 inspection at the Antrim Wind Park project. In the letter, NHDES requested the following remedial actions be taken:

- 1. Please install appropriate permanent stabilization BMP's at the base of the rock slope adjacent to wetland AN-41 and remove any accumulated sediment which has been deposited outside of the approved impact area. NHDES believes this can be accomplished within 20 days. Please submit photos documenting compliance was achieved. NHDES believes this can be accomplished within 7 days of completing the work.*
- 2. Within 20 days of the date of this letter provide DES with a plan for review, to re-establish the hydrology through culvert SD-26 to alleviate perched conditions at the inlet.*
- 3. Remove sections of the pole ford located in the stream channel up gradient of culvert SD-4 to restore flows to the natural channel and submit photos documenting the work has been completed.*
- 4. In accordance with the approvals, approximately 45.8 acres of the overall disturbed areas are to be restored and re-vegetated, including roadway shoulders, side slopes, and portions of the construction pads. Please provide documentation that you have or will be achieving the required restoration of the 45.8 acres.*

Antrim Wind responses:

1. See the attached photo log which provides documentation that temporary stabilization in the form of straw mulch and seeding has been installed in the permitted wetland impact area and at the toe of the rock slope adjacent to AN-41. During the site visit on July 26, 2019, it was recommended and agreed to by NHDES that the sediment would be mulched to be stabilized and the area would be monitored for revegetation. This area was stabilized within one week of the NHDES site visit as demonstrated in the inspection report completed on August 2, 2019.
2. The earthwork contractor has added fill and small diameter blast rock to raise the elevation of the ground upstream of the inlet, alleviating the perched condition of the culvert inlet. See attached photo log for documentation. This work had been completed as a response to comments made by NHDES staff during the July 26, 2019, site inspection and was completed prior to receipt of the September 10, 2019, letter requesting remedial actions.
3. The pole ford is a pre-existing condition and is outside the permitted Limit-of-Disturbance (LOD) licensed under the project's approvals. We are concerned that removing the pole ford will require access by tracked equipment and earth work and stream channel restoration that is beyond simply removing the pole ford. These activities would likely result in earth disturbance outside the project's approved LOD. In addition, Antrim Wind will not perform work outside of

the LOD without express written approval from the SEC. Let us know if you would like to discuss further.

4. As-built survey provided by the contractor demonstrates that 46.3 acres of disturbed area has been restored. See the attached for a figure documenting the as-built survey.

Please let us know if you would like to review or discuss these responses.

Antrim Wind would also like to put environmental monitoring on-hold once all earth work activities stop and site restoration has been completed. The last earth work activities on site will be installation of the turbine transformer containment which is scheduled to be completed by December 1, 2019.

Thank you for your attention.

Sincerely,

Dana Valleau, TRC Project Manager

Cc: Pam Monroe, NHSEC
Jeff Nelson, TransAlta

Attachments (2)

Antrim Wind Energy Project Photographic Log



Photo 1: Image taken on 8/2/2019. Image showing the base of the rock slope adjacent to wetland AN-41 was stabilized with straw mulch per NHDES recommendations during 7/26/2019 inspection.



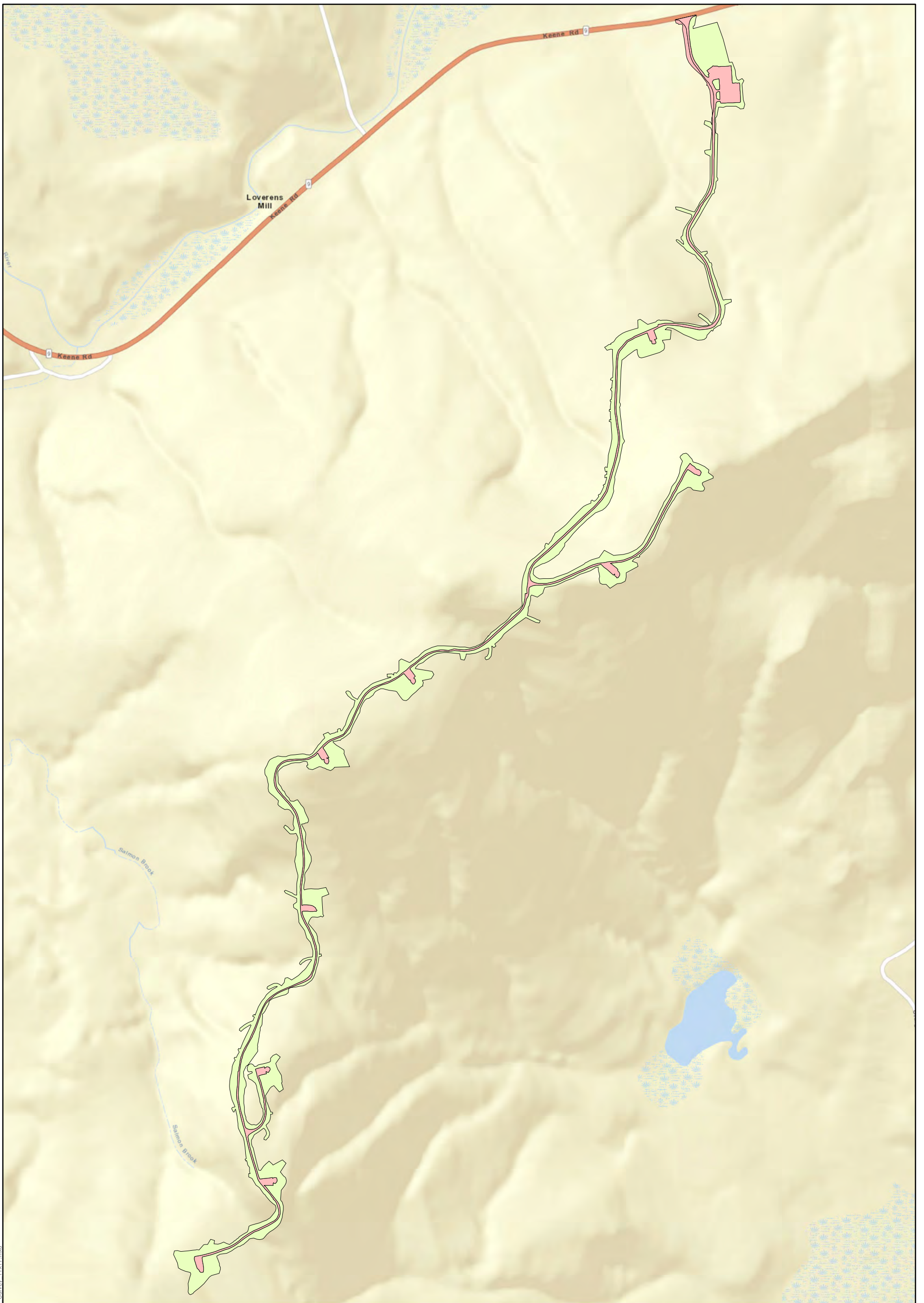
Photo 2: Image taken on 8/28/2019. Image showing the base of the rock slope adjacent to wetland AN-41 was hydroseeded prior to the inspection on 8/28/2019.



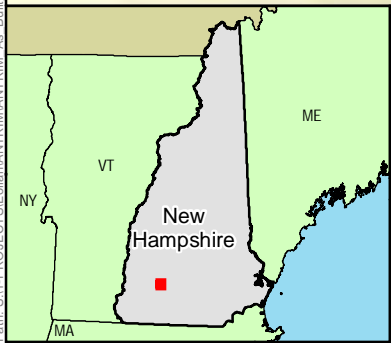
Photo 3: Image taken on 9/26/2019. Image showing revegetation progress at the base of the rock slope adjacent to wetland AN-41.



Photo 4: Image taken on 9/12/2019. Image showing fill and small diameter blast rock has been added to raise the elevation of the ground upstream of the inlet at culvert SD-26, alleviating the perched condition of the culvert inlet. Corrective actions to address perched conditions were taken prior to receipt of the letter from NHDES dated 9/10/2019.



Path: S:\PROJECTS\Edelman\ANTRIM As-Built_Survey_11x17.mxd

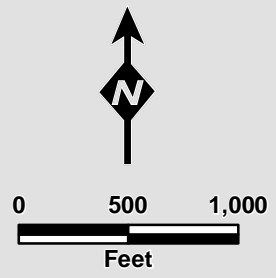


Legend

- Permanent Developed Footprint (11.3 acres)
- Restored or Undisturbed Area (46.3 acres)

Source: Sargent Corporation, Antrim As-Built.dwg and Vegetated Areas.dxf, accessed 10/2/2019.

INFORMATION DEPICTED HEREON IS FOR REFERENCE PURPOSES ONLY AND IS COMPILED FROM BEST AVAILABLE DATA SOURCES. TRC ASSUMES NO RESPONSIBILITY FOR ERRORS ARISING FROM MISUSE OF THIS MAP.



Antrim Wind Energy Project
Antrim, New Hampshire

As-Built Survey

TRC

14 Gabriel Drive
 Augusta, ME 04330