

February 10, 2016

Kelly Short, Chair
Canterbury Conservation Commission
PO Box 500
Canterbury, NH 03224

Re: Northern Pass Project -- Request for Information

Dear Ms. Short:

Thank you for your January 26, 2016 letter addressed to Sarah Hoodlet requesting additional information about the Northern Pass Project wetlands application. I have been asked to reply for the Project. Below are responses to your three questions that we hope will assist you in your review of the Project permit applications. Please let us know if you have follow up questions.

Question 1. Construction vehicles will cross many wet areas as well as 11 small brooks and 4 larger brooks/streams in Canterbury. The total impact area is projected to be 83,000 sq. ft. The permit application indicates that all of these will be crossed with temporary structures, but does not provide any information about the type of structures that will be used. What specific structures will be used to cross the 4 larger brooks/streams? Traveling north to south, they are:

- 1. Unnamed brook shown on topo sheet 567.*
- 2. Bryant Brook shown on topo sheet 569.*
- 3. Cold Brook (north) shown on topo sheet 575.*
- 4. Cold Brook (south) shown on topo sheet 580.*

We would like a specific description or construction plan for each crossing.

Response to Question 1

Northern Pass has committed to minimizing impacts to streams during construction. Access across streams for construction purposes will generally involve spanning stream channels with temporary structures. The contractors hired to construct the project may have a variety of temporary bridging materials available to accomplish this, and will participate in determining the most suitable crossing structure at each location. A Project Construction Plan will be developed that identifies acceptable

construction methods, materials, and schedules for all construction activities, including acceptable methods and structures for each stream crossing. This information is not available at this time, but will be developed during final design. For narrow streams with well-defined banks, one or more well-placed timber mats may be adequate to span the stream. Stacked timber mats may be used at some locations, and portable bridging may be used at wider crossings. For braided streams through large wetlands, work may be scheduled for winter with ice cover. We cannot provide the precise stream crossing mechanism at any given location at this time.

Question 2. We are concerned that the Wetlands Bureau of the NH Department of Environmental Services does not have the enforcement staff needed to daily monitor a project as Northern Pass. Does the Northern Pass proposal include financial support to the DES Wetlands Bureau so that it can hire contractors/staff for wetlands monitoring/enforcement for this project?

Response to Question 2:

First, Northern Pass submitted a wetlands application fee to DES of over \$1.2 million, a fee that is intended to fund the agency's work for the technical review of the application and related costs, including administrative and enforcement costs. We have no knowledge of DES's plans for its enforcement of the conditions imposed by the wetlands permit (and others) issued for the project, but we fully anticipate that it will be rigorous. In addition, Northern Pass has made a commitment to provide, and pay for, Environmental Monitors who will be present during construction of the project to ensure that Contractors adhere to all plans, BMPs, and avoidance and minimization methods developed for the project, as well as any agency-specified permit conditions.

Question 3. What does Northern Pass propose in the form of financial compensation or land conservation efforts to the towns or state to mitigate for the disruptions and in some instances, loss of wetlands along the project corridor?

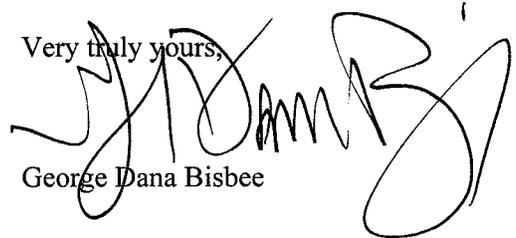
Response to Question 3:

Northern Pass has submitted a Natural Resource Mitigation Plan with its NHDES Wetland Application and Section 404/10 Application to the US Army Corps of Engineers. This plan can be found in Appendix 32 of the SEC Application, which is available on the SEC's website. This report describes the restoration planned for temporary wetlands impacts, as well as the compensatory mitigation that will address permanent and secondary resource impacts, in compliance with state and federal requirements. Permanent wetland impacts across the entire project are limited to approximately 2.5 acres. The quantity of secondary impact that is also included in the mitigation plan is approximately 28 acres. The plan for mitigating approximately 31

acres of impacts includes the preservation of about 1,500 acres of ecologically valuable parcels as well as an in-lieu-fee payment to the New Hampshire Aquatic Resource Mitigation (ARM) fund. The preservation parcels are located in the Connecticut River Watershed of Coos County, and in the Pemigewasset and Merrimack Watersheds in the central and southern portion of the Project area. An ARM fund payment of \$3,070,336 is planned to address mitigation for impacts in three watersheds where no preservation parcels are proposed. This compensatory mitigation package is more than three times greater than the required 15:1 mitigation ratios under the most stringent federal mitigation guidelines. The impacts in Canterbury that must be mitigated total 7,869 square feet. (If the project were limited to Canterbury, this impact would not trigger the compensatory mitigation requirement under NH DES rules). Northern Pass has proposed that the impacts in Canterbury and other towns in the Merrimack River watershed will be mitigated by preservation of an 86.5 acre site in Pembroke containing well-managed forests, vernal pools, a perennial stream, and a beaver flowage wetland.

We hope you find this information helpful. Please feel free to contact us with any additional questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "George Dana Bisbee", written over the typed name below.

George Dana Bisbee

GDB:aec

cc: Collis Adams, Wetlands Bureau
Canterbury Board of Selectmen
Sarah Hoodlet, Northern Pass