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June 27, 2016

VIA ELECTRONIC MAIL & HAND DELIVERY

Pamela Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: NH Site Evaluation Committee Docket No. 2015-02: Application of Antrim Wind Energy, LLC for Certificate of Site and Facility: NH Department of Environmental Services Progress Report Response

Dear Ms. Monroe:

Please find enclosed for filing in the above captioned matter a narrative response and supporting materials provided in response to the NH Department of Environmental Services ("NHDES") progress report received on April 26, 2016. The progress report included an outline of draft permit conditions as well as additional data requirements needed to make a final decision. Antrim Wind Energy has been in consultation with NHDES and New Hampshire Fish & Game in response to these requests. A copy of the enclosed materials has been provided to NHDES and one hard copy will be provided to the Committee today.

Please contact me with any questions regarding this submittal.

Sincerely,



Barry Needleman

BN:rs3
Enclosures

cc: Distribution List



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June 27, 2016

VIA FEDEX

Craig D. Rennie, CWS, CWB
Inland Wetland Supervisor
NH Department of Environmental Services
Water Division
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

RE: NH Site Evaluation Committee Docket No. 2015-02: Application of Antrim Wind Energy, LLC for Certificate of Site and Facility: NH Department of Environmental Services Progress Report Response

Dear Mr. Rennie:

Please find enclosed for filing in the above captioned matter a narrative response and supporting materials provided in response to the NH Department of Environmental Services (“NHDES”) progress report received on April 26, 2016. The progress report included an outline of draft permit conditions as well as additional data requirements needed to make a final decision. Antrim Wind Energy has been in consultation with NHDES and New Hampshire Fish & Game in response to these requests. A copy of the enclosed materials has been provided to NHSEC and one hard copy will be provided to you today.

Please contact me with any questions regarding this submittal.

Sincerely,

Dana Vallean
Environmental Specialist

Enclosures

cc: Pamela G. Monroe, Administrator NHSEC
ec: Jack Kenworthy, Applicant
Thomas Burack, Commissioner, NHDES
Clark Friese, Asst. Commissioner, NHDES
Eugene Forbes, Water Division Director, NHDES
Dave Keddell, ACOE

NHDES ADDITIONAL DATA REQUIREMENTS RESPONSES

ANTRIM WIND ENERGY, LLC

JUNE 2016

Alteration of Terrain Bureau

1. The pre and post-development drainage analysis did not include node listing summaries which totals the flows, areas, volumes, depths, etc. (note that HydroCAD can generate this report for you). Please submit pre and post-development node listing summaries for the 2, 10 and 50-year storm events that includes the summation of all nodes used in the model.

Response: Node listing summaries are included with all HydroCAD model reports in this submittal. A revised stormwater report is attached as Exhibit 4A. This attachment is intended as a substitute for the report included in Exhibit 4, as included in the original application.

2. The application states that there will be an increase in impervious area by 495,292 square feet; however, the drainage analysis only accounts for an increase of 386,117 square feet of impervious area over the existing conditions. Please explain the discrepancy and revise the analysis if necessary.

Response: All land cover and water quality treatment calculations have been reviewed and revised. Revisions to design plans, driven by NHDES comments, has resulted in a change in the impervious area to 495,555 square feet. All new impervious area is accounted for in the land cover calculations (see the attached Exhibit 4A, Appendix A). BMP worksheets are provided for all new impervious areas receiving water quality treatment (see the attached Exhibit 4A, Appendix B). New impervious areas where treatment is not provided (i.e. stream and wetland crossings, etc.) are not accounted for.

3. Rainfall distribution data must be obtained from the Northeast Regional Climate Center and must be used in the drainage analysis (see <http://precip.eas.cornell.edu/>). Please include a copy of the extreme precipitation table as obtained from the above referenced website, and submit a revised drainage analysis and summary. Also, be sure that any revisions still meet the Channel Protection Requirements of NH Administrative Rule Env-Wq 1507.05, and the Peak Runoff Control Requirements of Env-Wq 1507.06.

Response: A copy of the extreme data table is including in Exhibit 4A of this submittal. This attachment is intended as a substitute for Exhibit 4 as included in the original application. In addition, all models have been revised to use the new rainfall data, and are resubmitted. The change made no appreciable difference.

4. The proposed bioretention ponds adjacent to the O&M facility do not appear to meet the treatment requirements of Env-Wq 1508.06. Specifically, pretreatment is not provided, the ponding area does not contain 100% of the water quality volume (WQV), and a planting plan was not provided. In addition, the design infiltration rate of the underlying soil shall be determined in accordance with Env-Wq 1504.14. Please include these criteria in the design of the ponds.

Response: The plans, attached as part of Exhibit 4A, have been revised to include pretreatment of runoff from the substation and O&M yards via a sediment forebay. The bioretention basins have been replaced with a surface sand filter. A planting plan is no longer required. The sand filter will be underdrained, and infiltration testing is not applicable.

5. Provide test pit data in the location of the bioretention ponds to show the estimated seasonal high water table (SHWT) elevations.

Response: The sand filter is underdrained and test pits are not applicable.

6. It appears that some of the fill slopes adjacent to the roadway may require benching pursuant to Env-Wq 1508.19. Please revise the plans accordingly.

Response: The slopes along the access road have been reviewed and revised accordingly. A summary sheet is included with the revised Appendix 7A-2, Civil Design Drawings. This attachment is intended as a substitute for Appendix 7A in the NH SEC Application for a Certificate of Site and Facility.

7. Due to concerns with blasting near public and private water supply wells, the following items are requested. For further clarification or discussion on these requirements, please contact Brandon Kernen with the DES Drinking Water & Groundwater Bureau at (603) 271-0660, or email at brandon.kernen@des.nh.gov:

a) If greater than 5,000 cubic yards of blasting is required to complete the project, then please identify drinking water wells located within 2,000 feet of the proposed blasting activities, and develop a groundwater quality sampling program to monitor for nitrate and nitrite either in the drinking water supply wells or in other wells that are representative of the drinking water supply wells in the area.

Response: The applicant requests that this be made a condition of approval to be submitted by the applicant prior to construction. This plan will be prepared by the Contractor's blasting subcontractor. The extent of blasting has not yet been determined.

b) Please include the required blasting BMP notes on the plans as developed by DES in order to protect water quality. The blasting BMP notes can be found in Attachment A of the following document, which is posted on our website at:

<http://des.nh.gov/organization/commissioner/pip/publications/wd/documents/wd-10-12.pdf>

Response: Blasting BMP notes have been added to sheet G-2. A revised sheet G-2 is included in the revised Appendix 7A-2.

8. The Natural Heritage Bureau's (NHB) review of the project indicated the presence of Ebony boghaunter and Marsh wren near the project area, which are considered a state species of concern and a rare species, respectively. Please contact Kim Tuttle from the NH Fish & Game Dept. for guidance on how to mitigate the potential project related impacts, and include their recommendations when responding to this letter. Kim can be reached at (603) 271-6544 or email at:

Kim.A.Tuttle@wildlife.nh.gov

Response: AWE has consulted extensively with both NHF&G and NHHNB since 2010. NHHNB has twice issued letters to AWE indicating that they think it is unlikely that the project will impact rare plant species or exemplary natural communities (see 2012 and 2015 letters from NHHNB). AWE also developed all of its wildlife study protocols dating back to 2010 with NHFG, which never expressed concerns about ebony boghunter or marsh wren during the development or execution of AWE's study protocols, or in any final recommendations to the NH SEC in Docket 2012-01. AWE incorporated all recommendations from NHF&G from the 2012-01 docket into its application in docket 2015-02. Prior to filing that application in October 2015, AWE again sought to consult with NHFG, but was unable to receive any comments from the agency despite numerous inquiries. Upon receiving DES's April 2016 comments in Docket 2015-02, AWE again reached out to consult with NHFG. At the time of this

submission, despite numerous attempts by AWE to receive any comments from NHFG, we have received none. AWE prepared a memo in response to the concerns identified in the DES questions, which is attached (see Attachment 1). As noted in the memo, it is AWE's position that there will not be any impacts to the species identified and therefore no further action by AWE is necessary in this regard. Should further information become available to AWE related to NHFG's concerns, if any, AWE will inform DES and the SEC.

Subsurface Systems Bureau

1. Provide ledge probes down slope of the proposed system to prove adequate receiving area in accordance with Env-Wq 1006.04(c).

Response: Ledge probe data was provided to the Subsurface Systems Bureau in October 2015, and to the NHSEC on November 17, 2015. For your convenience see the attached revised Appendix 2F.

2. In accordance with Env-Wq 1004.14, if an ISDS requires state approvals or permits under other state statutes, DES shall not approve the application until the department receives information confirming other approvals have been obtained. Please provide a copy of the dredge and fill permit and alteration of terrain permit.

Response: State approvals will be provided to the Subsurface System Bureau when they are completed.

Wetlands Bureau:

1. Please label each wetland and stream impact on the grading plans in square feet (and linear feet for streams) and provide a distinct hatching or color-coding on the plans to clearly show all wetland impact areas. In addition, the stream ID numbers where not labeled.

Response: Labels and hatching have been added to the Civil Design Drawings, which are included as a revised Appendix 7A-2.

2. The plans do not clearly show the location of all temporary erosion controls, particularly where proposed grading is in close proximity to wetlands and surface waters. Please demarcate the location of erosion controls in all locations where necessary to protect water quality and wetland resource areas.

Response: Erosion control BMP locations have been clarified on the Civil Design Drawings, which are included as a revised Appendix 7A-2.

3. The Natural Heritage Bureau's (NHB) review of the project indicated the presence of Ebony boghaunter and Marsh wren near the project area, which are considered a state species of concern and a rare species, respectively. Please contact Kim Tuttle from the NH Fish & Game Dept. for guidance on how to mitigate the potential project related impacts, and include their recommendations when responding to this letter. Kim can be reached at (603) 271-6544 or email at: Kim.A.Tuttle@wildlife.nh.gov

Response: AWE has consulted extensively with both NHF&G and NHHNB since 2010. NHHNB has twice issued letters to AWE indicating that they think it is unlikely that the project will impact rare plant species or exemplary natural communities (see 2012 and 2015 letters from NHHNB). AWE also developed all of its wildlife study protocols dating back to 2010 with NHFG, which never expressed

concerns about ebony boghunter or marsh wren during the development or execution of AWE's study protocols, or in any final recommendations to the NH SEC in Docket 2012-01. AWE incorporated all recommendations from NHF&G from the 2012-01 docket into its application in docket 2015-02. Prior to filing that application in October 2015, AWE again sought to consult with NHFG, but was unable to receive any comments from the agency despite numerous inquiries. Upon receiving DES's April 2016 comments in Docket 2015-02, AWE again reached out to consult with NHFG. At the time of this submission, despite numerous attempts by AWE to receive any comments from NHFG, we have received none. AWE prepared a memo in response to the concerns identified in the DES questions, which is attached (see Attachment 1). As noted in the memo, it is AWE's position that there will not be any impacts to the species identified and therefore no further action by AWE is necessary in this regard. Should further information become available to AWE related to NHFG's concerns, if any, AWE will inform DES and the SEC.

4. The Environmental Protection Agency's (EPA) preliminary review of the application indicated that the project is ineligible for the NH Programmatic General Permit (POP) as additional information is needed regarding secondary impacts to wetlands. Please coordinate with the EPA and the Army Corps of Engineers regarding secondary impact assessments and provide an update to DES.

Response: EPA and the Army Corps concur that the Project is eligible for NH Programmatic General Permit (PGP). See Attachment 2 for documentation.