13 Legends Drive Hooksett, NH 03106



August 26, 2019

Mr. David Price NHDES Wetlands Bureau, Pease Office 222 International Dr., Suite. 175 Portsmouth, NH 03801

Re: Seacoast Reliability Project - SEC Docket 2015-04 Notification of Minor Construction-Related Changes

Dear Dave;

Eversource has identified nine changes in wetland impacts and access roads as a result of minor modifications to accommodate construction needs. As discussed herein, the New Hampshire Department of Environmental Services ("Department" or "NHDES") is authorized to review and approve such minor modifications.

In accordance with the Certificate of Site and Facility ("Certificate") issued to Eversource by the Site Evaluation Committee, and similar to that of the recently completed Merrimack Valley Reliability Project (a 345kV transmission line jointly constructed by Eversource and National Grid), the Department has the authority to oversee construction of those aspects of the Seacoast Reliability Project ("Project") that are within the Department's jurisdiction. The Certificate provides that:

NHDES is authorized to monitor the construction and operation of the Project to ensure that the terms and conditions of the Wetlands Permit, the Alteration of Terrain Permit, the Shoreland Protection Permit, and the Certificate are met....;

NHDES is authorized to specify the use of any appropriate technique, methodology, practice or procedure approved by the Subcommittee within the Certificate, as may be necessary, to effectuate conditions of the Certificate, the Wetlands Permit, the Alteration of Terrain Permit, and the Shoreland Protection Permit; ...

NHDES is authorized to specify the use of any appropriate technique, methodology, practice or procedure approved by the Subcommittee within the Certificate, as may be necessary, to effectuate conditions of the Section 404 General Permit (the New Hampshire Programmatic General Permit)

The NHDES Revised Final Decision, dated October 29, 2018, states that "[a]ny further impacts to jurisdictional areas for the project beyond those identified in the application materials received September, 2017, will require further permitting in accordance with RSA 482-A."

The proposed changes identified herein, do not rise to the level of a significant amendment to the NHDES Revised Final Decision, and therefore, the Department may approve these minor modifications without requiring Eversource to seek a new application from NHDES or requesting a material change to the Certificate. RSA 482-A:3(e) defines a "significant amendment" as a an "amendment which changes the proposed or previously approved acreage of the permitted fill or dredge area by 20 percent or more, relocates the proposed footprint of the permitted fill or dredge area, includes a prime wetland or surface waters of the state, includes a wetland of a different classification as classified by the department, or includes non-wetland areas requiring permits for filling and dredging."



The following changes—which do not meet the definition of a significant amendment—are briefly discussed below, tabulated in Table 1, and depicted in the attached drawings.

- Structure 24, Map 6. The contractors have removed the existing utility pole in Wetland DW 65 from the timber work pad. This change has resulted in an additional 252 square feet of temporary impact due to the need to briefly lay timber mats to reach the pole. The change was necessitated to avoid overhead wires from adjacent utilities, and minimal disturbance to the upland and parking area.
- Structures 28-29, Map 7. The contractors recommended the shift in the access road from the western edge of the right-of-way (ROW) to the center. They felt it was a safer route because it eliminates a side-slope, which was a concern for heavy equipment (concrete trucks needed for pouring Structure 28). No additional impacts to wetlands or other natural resources results from the change. Steep slope BMPs were implemented, including timber mats on the slope, silt fence and straw bales to stabilize side slopes and seeding with upland conservation mix to re-establish vegetative cover on exposed soils.
- Structures 34-35, Map 7. The Town of Durham allowed Eversource to access the ROW from the water tower east of Structure 34, which eliminated the need for wetland access across DW41. Temporary wetland impacts decreased by 8,088 sf to DW 41.
- Structure 39, Map 8. The access road was shifted to the west to use a more complete breach in the stone wall, and further reduce wetland impacts. This change results in a decrease of 648 sf of temporary wetland impact to DW 46.
- Structures 48-49, Map 12. Prior to commencing construction, Eversource reflagged the wetland boundaries of DW56. Since the original delineation of DW56, the boundaries of this wetland have expanded. Therefore, Eversource used additional timber mats, in accordance with best management practices, to limit potential impacts to the expanded wetland boundaries. In addition, the access road was shifted to the north side of the ROW to allow for easier and safer construction access in this section. These updates result in an increase in 3,693 sf of temporary wetland impact to the newly flagged boundaries of DW 56.
- Structures 49-50, Map 12. The access road was shifted to the north side of the ROW to allow for less disturbance/avoidance of a stone wall, to reduce temporary wetland impacts. This change results in a decrease of 1,627 sf of temporary wetland impact To DW 54.
- Structures 56-57, Map 13. The access road was shifted to the north to access an existing breach in the stone wall, and avoid a ledge outcrop on the slope. This change resulted in an increase in 745 sf of temporary wetland impact to DW 31.
- Structure 81-82, Map 17. The contractors can avoid impacting Wetland DW 38 and a steep slope area by coming in from the east and the west. This change will result in a decrease of 4,014 sf of temporary wetland impact.
- Structure 85-86, Map 17. The contractors require a wider access road to accommodate pulling wire to Structure 85 and will not need to use all of a proposed work pad in wetland to the southeast, resulting in a net increase of 734 sf of temporary wetland impact to DW 24. The stone wall will either be bridged or dismantled.

- Underground Section Between Structure 106 and 107, Map 24. In order to facilitate a proper and successful stream diversion for Knights Brook during trench excavation and duct bank installation, the contractors require a location to stage pumps and containment in close proximity and at similar elevation located within Wetland NW16. The stream diversion setup will be constructed using temporary timber mats with the pumps inside primary containment. These changes will result in a net increase of 3,213 sf of temporary wetland impact to NW 16.
- Underground Section Between Structure 106 and 107, Map 24 and Map 25. As required by the Soil Management Plan for the Frink Farm, top soils from trench area are required to be replaced upon restoration. The top soils within the wetland areas will be temporarily wind-rowed up to the northerly edge of the easement. The soils will be piled onto of filter fabric placed over timber mats to reduce impacts to the wetland at the wind row location when the Contractor moves the top soil back into the trench during restoration. These changes will result in net decreases of 312 sf of temporary wetland impact to wetland NW 18 and 164 sf of temporary impact to wetland NW 20; the additional area of temporary impacts to wetland NW 16 due to soil management are included in the 3,213 sf described above.

These changes do not result in a significant amendment that require further permitting, but rather decrease the overall permitted temporary impacts by 6,216 square feet and do not alter permitted permanent wetland impacts (Table 1). The Project was originally approved with 607,777 square feet of total impacts (598,307 square feet of temporary impacts and 9,470 square feet of permanent impacts). These minor alterations to temporary impacts described herein do not increase the approved acreage by 20 percent or more; in fact, the changes decrease overall impacts. The changes will not impact any new wetland. All changes described herein occur within the existing right-of-way and within the Project corridor. Therefore, the proposed changes do not alter the permitted footprint of the Project.

In addition, these minor modifications do not impact a prime wetland or surface water; do not impact a wetland of a different classification as originally permitted; and do not require permits for filling or dredging in non-wetland areas.

Based on the foregoing, the Department is authorized under both the Certificate and the NHDES Revised Final Decision to review Eversource's notification.

If you have any questions regarding this notification, please contact Sarah Allen (<u>sallen@normandeau.com</u>, 603-637-1158) or me (kurt.nelson@eversource.com, 603-634-3256).

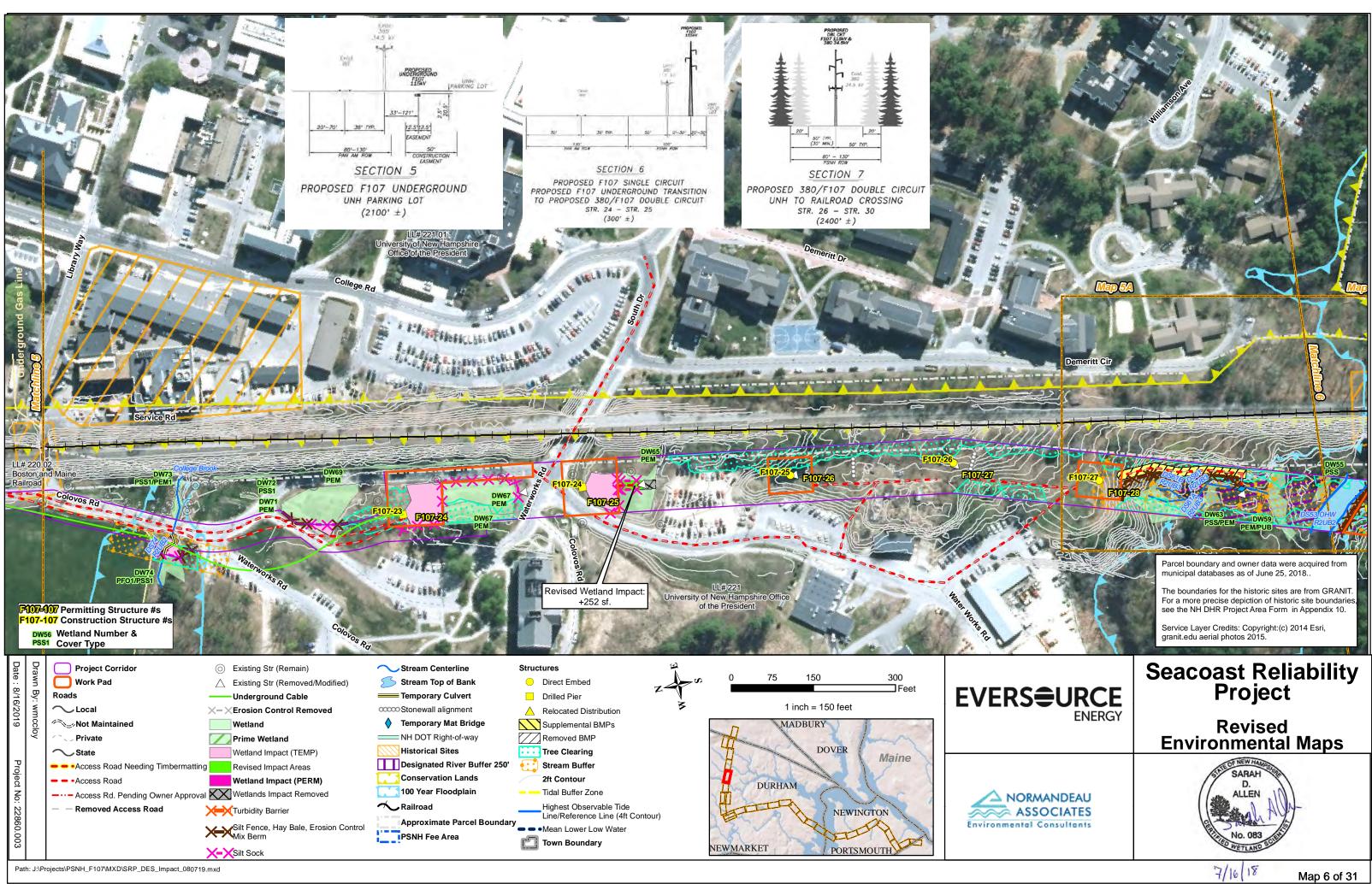
Sincerely,

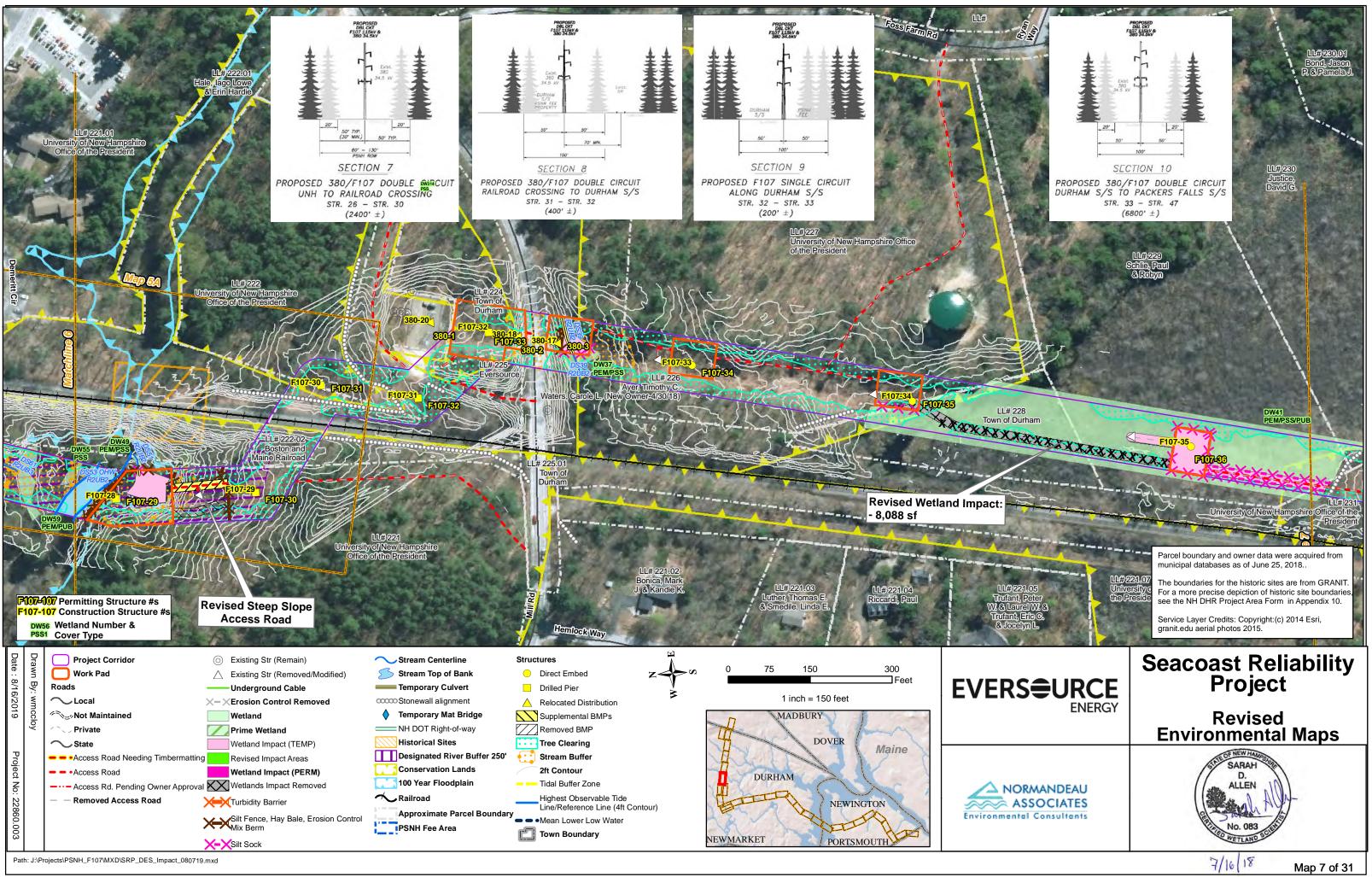
Eversource Energy

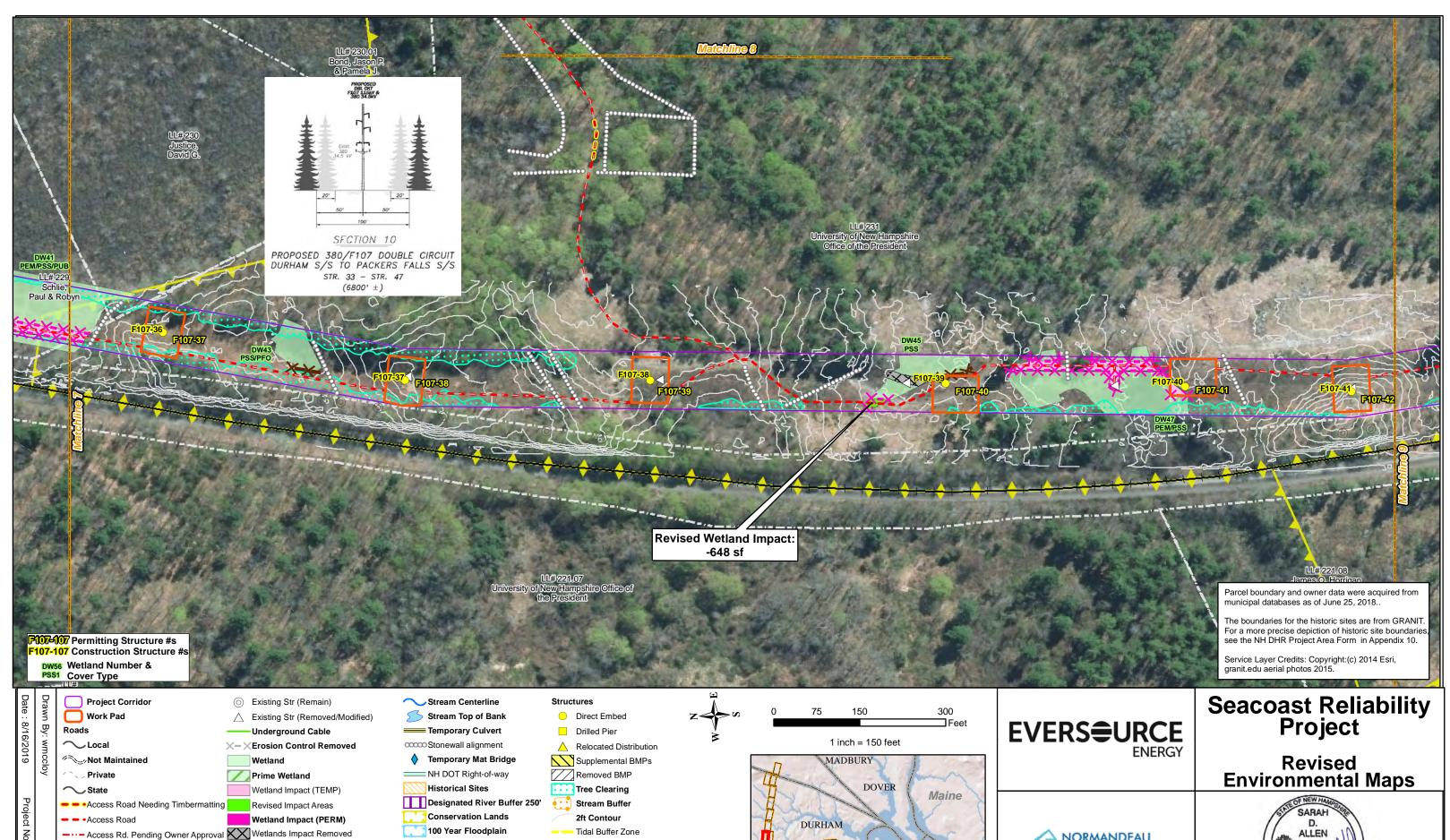
Kurt I. Nelson Sr. Licensing and Permitting Specialist

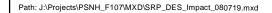
| | | ity Project wetland impact changes due to construction | | Change in |
|------------------------|--------|--------------------------------------------------------|----------------|-----------------|
| | Env | | | Temporary |
| | Map Pg | | | Wetland Impacts |
| Str. # | wap rg | Description | Wetland Id # | (sf) |
| 50.# | # | Description | | (31) |
| | | | | |
| | | Pulling old Str from work pad, not coming in through | B 11/25 | |
| 24 | 6 | Waterworks Rd laydown area. | DW65 | 252 |
| | | Changed the access location due to safety concerns. | | |
| | | New access is on the East side of work pad, coming | | |
| 28 | 7 | down the slope. | NA | 0 |
| | | Access Str. 35 from Str. 36. Not going to treck | | |
| 34-35 | 7 | through wetland DW41, north of Str. 35 | DW41 | -8,088 |
| | | Changed access route due to stone wall WP-9. New | | |
| | | route runs on the west side of ROW, also limiting | | |
| 39 | 8 | wetland impacts east of Str. 39. | DW46 | -648 |
| | | Flagging of wetland prior to construction showed | | |
| | | that DW56 expanded. Additional timber mats were | | |
| | | required to account for the expansion of the | | |
| | | wetland boundaries. In addition, the access road | | |
| 10.10 | 12 | was shifted for safer, more efficient access relative | DIMEG | 2,002 |
| 48-49 | 12 | to stone wall WP-14. | DW56 | 3,693 |
| | | Changed access due to stone wall WP-14. New | | |
| | | route is on north side of ROW. It also limits wetland | | |
| 49-50 | 12 | impact in wetland DW54. | DW54 | -1,627 |
| | | Changed access due to stone wall WP-17 and slope. | | |
| 56-57 | 13 | New route is on north side of ROW. | DW31 | 745 |
| | | Avoided steep slope and wetland crossing by coming | | |
| 81-82 | 17 | in from east and west | DW38 | -4,014 |
| | | Shrank Str 85 pullpad on north side, but doubled its | | |
| | | width. Approaching Str 86 from east which allowed | | |
| | | project to shrink workpad and eliminate the access | | |
| 85-86 | 17 | road. | DW24 | 734 |
| | | Additional temporary wetland impacts in Wetland | | |
| | | NW16 for placement of timber matting to | | |
| Underground | | accommodate Knights Brook stream diversion setup. | | |
| Section | | Also additional temporary wetland impacts required | | |
| between | | along north side of trench to allow temporary stock | | |
| Structure 106 | | pile of top soil to be replaced upon completion of | | |
| and 107 (Frink | 24 | duct bank. Top soil will be temporarily placed on | | 2 2 4 2 |
| Farm) | 24 | filter fabric over mats. | NW16 | 3,213 |
| Underground Section | | Additional temporary wetland impacts required | | |
| between | | along north side of trench to allow temporary stock | | |
| Structure 106 | | pile of top soil to be replaced upon completion of | | |
| and 107 (Frink | | duct bank. Top soil will be temporarily placed on | | |
| Farm) | 25 | filter fabric over mats. | NW18 & NW20 | -312 & -164 |
| Total Change | | | | |
| in Impacts | | | | -6,216 |
| • | 1 | 1 | | - |

Table 1. Seacoast Reliability Project wetland impact changes due to construction modifications.









- Removed Access Road

Turbidity Barrier

X=XSilt Sock

Silt Fence, Hay Bale, Erosion Control

Railroad

PSNH Fee Area

Highest Observable Tide

Town Boundary

Line/Reference Line (4ft Contour)

Approximate Parcel Boundary

🛆 NORMANDEAU ASSOCIATES **Environmental Consultants**

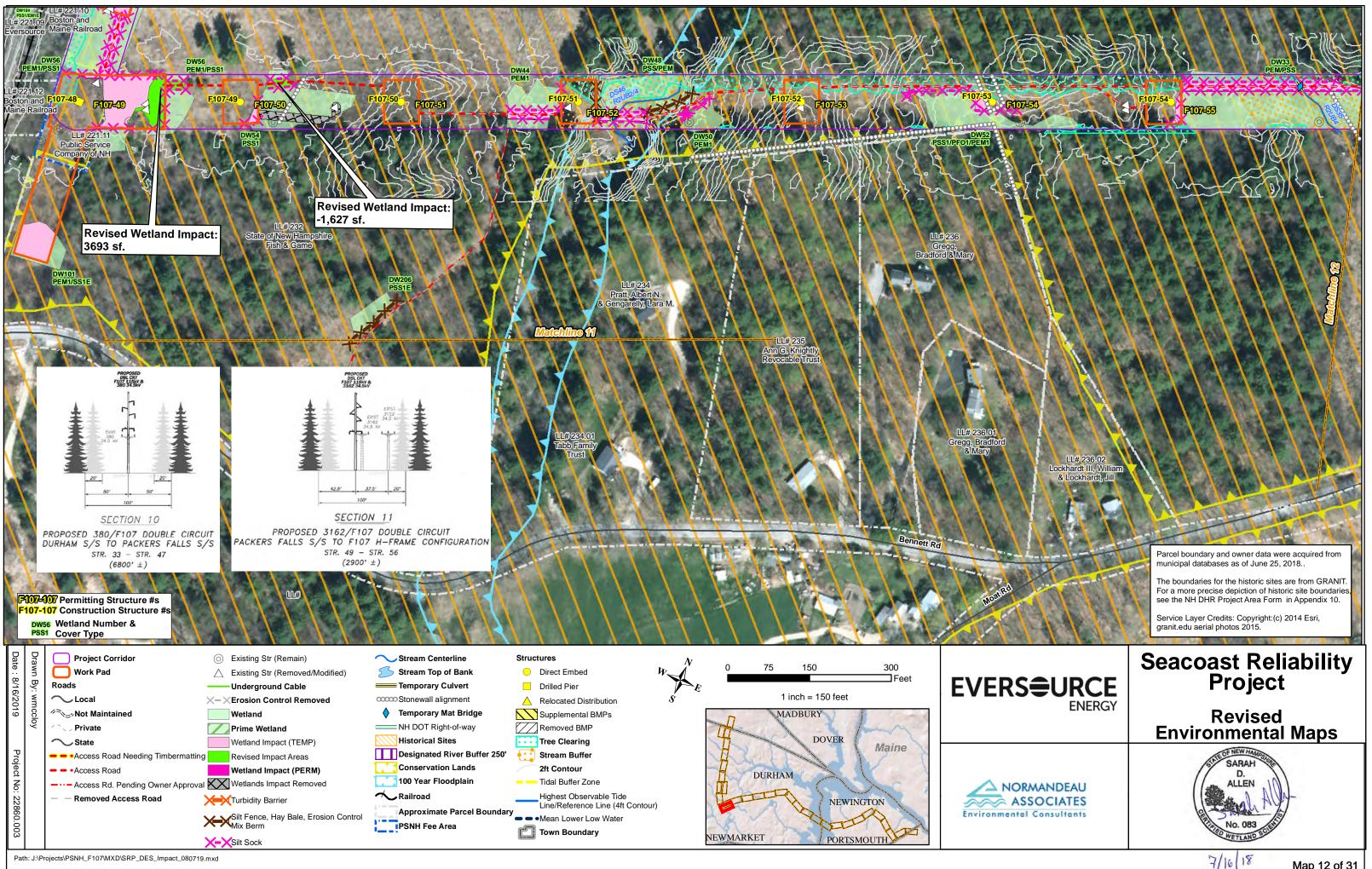
NEWINGTON

PORTSMOUTH

NEWMARKET

Map 8 of 31

7/16/18



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