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VIA ELECTRONIC MAIL AND U.S. MAIL

April 4, 2016

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

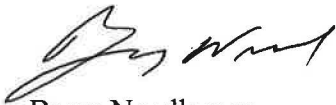
**Re: SEC Docket No. 2015-05: Public Service Company of New Hampshire d/b/a
Eversource Energy and New England Power Company d/b/a National Grid: Joint
Application for a Certificate of Site and Facility for the Merrimack Valley
Reliability Project**

Dear Ms. Monroe:

Enclosed for filing in the above-referenced Docket, please find an original and one copy of the Applicants' Response to the New Hampshire Department of Environmental Services ("NHDES") progress report dated March 2, 2016 for the Merrimack Valley Reliability Project. The progress report requested additional information from the Applicants. The enclosed Response provides that additional information. In addition, the Applicants request certain revisions to the Alteration of Terrain draft permit conditions, the Wetlands Permit project description, and the Wetlands Permit draft conditions.

Please contact me directly should you have any questions.

Sincerely,



Barry Needleman

BN:amd
Enclosure

cc: Distribution List (with enclosures)
Rene Pelletier, NHDES (with enclosures)

McLane Middleton, Professional Association
Manchester, Concord, Portsmouth, NH | Woburn, MA

McLane.com



April 4, 2016

Ref: 12650.00

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

Re: Joint Application of New England Power Company (d/b/a National Grid) and Public Service Company of NH (d/b/a Eversource Energy) for the Merrimack Valley Reliability Project (the "Applicants")
NH Site Evaluation Committee Docket No. 2015-05

Dear Ms. Monroe:

VHB has reviewed the NH Department of Environmental Services (NHDES) progress report dated March 2, 2016 for the Merrimack Valley Reliability Project located in Pelham, Windham, Hudson and Londonderry, New Hampshire. VHB is providing the additional data as requested in the progress report for Alteration of Terrain and the Wetlands Bureau requested by NHDES. In addition, the Applicants request certain revisions to the Alteration of Terrain draft permit conditions, the Wetlands Permit project description, and the Wetlands Permit draft conditions, as described herein.

ALTERATION OF TERRAIN MARCH 2, 2016 PROGRESS REPORT

1. In general, the Alteration of Terrain Permitting Plans (Pages 32 through 102) indicate the need for erosion control best management practices (BMPs) only at work areas that are immediately adjacent to surface waters or wetlands. Provide additional guidance or clarification relative to the criteria for implementation of BMPs in other work areas.

Implementation of erosion control BMPs beyond those identified on the Alteration of Terrain Permitting Plans and the Construction Access Plan (Attachment D) will be completed at the discretion of the contractor under the direction of a qualified environmental monitor who is a Certified Professional in Erosion and Sediment Control or a Professional Engineer. Implementation of BMPs will adhere to the "Best Management Practices Manual for Utility Maintenance in and Adjacent to Wetlands and Waterbodies in New Hampshire" (Appendix T) or National Grid's Environmental Guidance Document EG-303NE (Appendix S).

Erosion control BMPs on the Alteration of Terrain Permitting Plans were placed, as noted above, in work areas immediately adjacent to surface waters or wetlands. The placement of erosion controls on this plan

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Engineers | Scientists | Planners | Designers



set were solely based on proximity to water resources and did not take into account topographic gradient or other site-specific conditions. For that reason, BMP placement is considered conservative, relative to water resources, and it is anticipated that BMPs will be adjusted in the field to protect only those resource areas that are downgradient of work areas and subject to erosion or sedimentation.

In the Construction Access Plan, an analysis was completed that evaluated slope steepness with a focus on flow velocities that would result in erosion. Several assumptions were made regarding the construction activities relative to grading cut/fill slopes to 2:1, stabilizing graded slopes with erosion control blankets, utilizing gravel to stabilize access, and matching existing grades to maintain sheetflow. These assumptions reflect the Applicant's intent to minimize ground disturbance, maintain existing drainage patterns, and limit erosion and sedimentation. The analysis identified ten areas that will likely require additional BMPs (e.g. waterbars) due to steepness. The contractor and environmental monitor will coordinate to install the necessary BMPs prior to the start of construction.

The implementation of BMPs in additional areas not previously identified will be determined by the physical conditions of the site. The contractor and environmental monitor will evaluate slope, soil type, vegetative cover, and proximity to resources to determine the size and type of erosion controls required. This approach is described in the erosion control notes of the Alteration of Terrain Permitting Plan Set.

2. Provide justification for the proposed off-right-of-way accessway shown on page 36 of 102 of the Alteration of Terrain Permitting Plans. It appears access could be gained from other areas to the existing right-of-way.

The off-right-of-way access shown on Page 36 of 102 of the Alteration of Terrain Permitting Plan set has been removed. Updated plan sheets 35 and 36 have been included for your review and should replace the corresponding pages in the plan set. The Applicants have reviewed the on-ROW access and determined that this access is sufficient for the Project.

Project Specific Conditions (DRAFT):

4. All activities shall comply with the plans and information provided with the Alteration of Terrain application submitted as part of the application to the New Hampshire Site Evaluation Committee on August 5, 2015, and the conditions provided below. Any proposed modifications which may affect surface water quality or quantity, shall receive NHDES approval prior to implementation.

The Applicants request that NHDES modify this condition to include a reference to the revised Alteration of Terrain Permitting Plan Set pages provided in Supplement 2 of the SEC Application. Revised access and structure locations were made on November 30, 2015 and resulted in changes to 20 pages of the plan set. In addition, this letter includes revised pages 35 and 36 that should also be referenced in this condition.



WETLANDS BUREAU MARCH 2, 2016 PROGRESS REPORT

1. Review of the plans and application regarding construction mats and bridges over waterbodies does not adequately address how sediment, plant material, and/or other organic matter will be removed prior to machinery traversing these structures over NHDES jurisdiction. Please provide clarification to ensure no water quality violations occur.

All contractors will be required to clean construction mats prior to their placement within jurisdictional areas to prevent water quality violations. The placement and condition of matting in jurisdictional areas will be observed and inspected by the Company's environmental monitor. National Grid's vendor will be required to certify that the mats are clean prior to installation, in accordance with National Grid's Environmental Guidance EG-303NE. National Grid provides a certification form for this purpose.

In addition, mats will be placed above the water surface in stream crossings through the construction of a temporary air bridge. Air bridge construction is typically completed by placing small sections of mats outside the jurisdictional banks and parallel to the flow of water that act as supports. Mats may then be placed perpendicular to the stream, resting on top of the initial swamp mat supports. It may be necessary to place a large steel plate along the top of the swamp mats for extra stability and to minimize the amount of sediment that could fall between the spaces of each timber. Mats will be removed by the contractor prior to any anticipated significant storm event that could result in the overtopping/flooding of the mats and potential erosion and sediment deposition. Lastly, mats will be removed from wetland areas promptly once the crossing or maintenance activity is completed. The surrounding area will be stabilized and restored to prevent sedimentation and erosion.

Contractors are required to bring clean equipment to the site and remove plant material from the machinery when the contractor moves between work sites to prevent the spread of invasive species. It is expected that small amounts of sediment will be tracked onto the construction mats as the machine moves from dirt access ways to the construction mats. The amount of sediment on the mats will be monitored by the designated environmental monitor and will be manually removed if there is a water quality concern. If there are specific locations where there is a repeated concern, crushed stone or wood chip ramps may be placed within the upland areas at the entrance and exits of a matted water resource crossing to dislodge sediment from vehicle tracks/wheels prior to traversing the construction mats. A geotextile could be added beneath the stone or wood chip transition to facilitate removal of material following construction. An example of this BMP is found in the National Grid Environmental Guidance Document EG-303NE on pages 7-18, "BMP #15 Swamp Mat Layout" that was provided as Appendix S in the SEC Application.

2. NHDES has determined that the proposed permanent impacts within Lower Golden Brook Prime Wetland (identified as WA 46) located in Pelham may cause a significant net loss of wetland values set forth in RSA 482-A:1; therefore, please address Chapter Env-Wt 700.

The Applicants provided for compensatory mitigation of the proposed permanent impacts to the Lower Golden Brook Prime Wetland as part of the in-kind mitigation proposal for the total impacts in the town



of Pelham. The permanent impacts were mitigated at a ratio of 10:1 as upland buffer preservation. The proposed mitigation provides permanent protection for wetlands and buffers associated with the Little Island Pond Prime Wetland.

On-site wetland creation to mitigate for the loss of flood storage and other functions adjacent to Golden Brook Prime Wetland was not proposed because the property is not owned by the Applicant or currently protected under a conservation easement. The land adjacent to the Golden Brook Prime Wetland identified on Tax Map 15 is privately and publicly held. Lot 8-208 is a developed parcel that is privately owned. Lots 8-209, 8-210, and 8-213 are owned by Pelham. Lot 8-213 is developed as the Pelham Transfer Station. Lots 8-209 and 8-210 are undeveloped parcels that are not currently protected by an easement. In order for any wetland creation to be permanently protected, Pelham would have to impose a conservation easement on the selected property. It is VHB's understanding, based on communications with the Conservation Commission, that creating an easement on Pelham property would require approval by the Board of Selectman and possibly a town-wide vote. Given the timeline of the project and status of land adjacent to Golden Brook Prime Wetland, off-site mitigation on property owned by the Applicant was proposed.

The upland buffer preservation proposal provides for a 10:1 ratio of upland buffer preservation to square foot of impact. If wetland creation is required to provide compensatory mitigation in accordance with Env-Wt 703.01(b)(5), National Grid could propose a creation area at a 1.5:1 ratio of created wetland to impacted wetland immediately adjacent to the Little Island Pond Prime Wetland within the land proposed for transfer to Pelham. This proposal would have to be reviewed and approved by Pelham prior to developing a proposal for wetland creation. Please inform the Applicant as to whether or not wetland, in addition to upland buffer preservation, is required.

Project Description:

Dredge and fill 4,428 square feet of wetlands and 80 square feet of streams (impacting 17 linear feet) and temporarily impact 8.938.86 acres (388,895,385,896 square feet) of wetlands and 6,365 square feet (610 linear feet) within streams to construct 17.9 miles of new overhead 345kV electric transmission line (known as the 3124 Line) and relocation of 7.6 miles an existing 115kV electric transmission line (known as the Y-151 Line). All work will be conducted within an existing utility right-of-way. Compensatory mitigation for permanent and US Army Corps of Engineers wetland impacts consists of a one-time payment of \$12,898.60 dollars into the Aquatic Resource Mitigation Fund ("ARM") by New England Power Company d/b/a/ National Grid and a one-time payment of \$633,976.80 dollars into the ARM Fund by Public Service Company of New Hampshire d/b/a Eversource. In addition, the conservation of 5.945.53 acres of land comprising part of a parcel owned by NEP (Tax Map 30, Lot 7-11) shall be conveyed in fee to the Town of Pelham used as a component of the mitigation and added to the abutting Peabody Town Forest in the Town of Pelham.



Project Specific Conditions (DRAFT):

27. The 5.94 acres of land in Pelham shall be conveyed in fee ownership to the Town of Pelham within 120 days of the issuance of decision.

This condition should be changed to reflect that 5.53 acres is required for mitigation in Pelham. National Grid has conducted a land survey and was able to propose a subdivision of land equal to the required amount of compensatory mitigation. The condition should also be changed to require the conveyance as soon as practicable from the NH SEC's issuance of its final order and the Certificate of Site and Facility authorizing construction of the Project. The proposed timeline of 120 days from NHDES's decision is not workable for two reasons. First, NEP cannot convey its property unless and until it obtains all requisite permit and approvals to construct and operate the Project. Second, the conveyance cannot occur until the Town of Pelham Planning Board issues a final decision approving the Company's lot line adjustment application and the 30-day appeal period on that decision has expired without an appeal having been filed and the Town Board of Selectmen has voted to accept the gift from the Company under the conservation terms and conditions required by NHDES. The Company does not foresee any problems accomplishing these objectives and will work to do so expeditiously; however, the conveyance cannot take place until they all are complete.

29. This permit is contingent upon the execution of conservation restrictions on 5.94 acres of land in Pelham as depicted on plans and information prepared by VHB as received by NHDES on February 16, 2016.

This condition should be revised to reflect 5.53 acres of land. A draft of the subdivision plan is attached to this letter.

30. Following permit issuance and prior to recording of the conservation deed, the natural resources existing on the 5.94 acre parcel shall not be removed, disturbed, or altered without prior written approval of NHDES.

This condition should be revised to reflect a 5.53 acre parcel.

32. The plan noting the conservation areas with a copy of the final deed language shall be recorded with the Registry of Deeds Office for each appropriate lot. A copy of the recording from the County Registry of Deed Office shall be submitted to the NHDES Wetlands Bureau within 120 days of permit issuance.

This condition should be changed to require the submission of a copy of the recording from the County Registry of Deeds Office to the NHDES Wetlands Bureau within 14 days of the recording. National Grid cannot convey property unless and until it obtains all requisite permit and approvals to construct and operate the Project.

Pamela G. Monroe, Administrator
Ref: 12650.01
Page 6



Please do not hesitate to contact me if you have questions at (603) 440-4193 or strefry@vhb.com.

Sincerely,

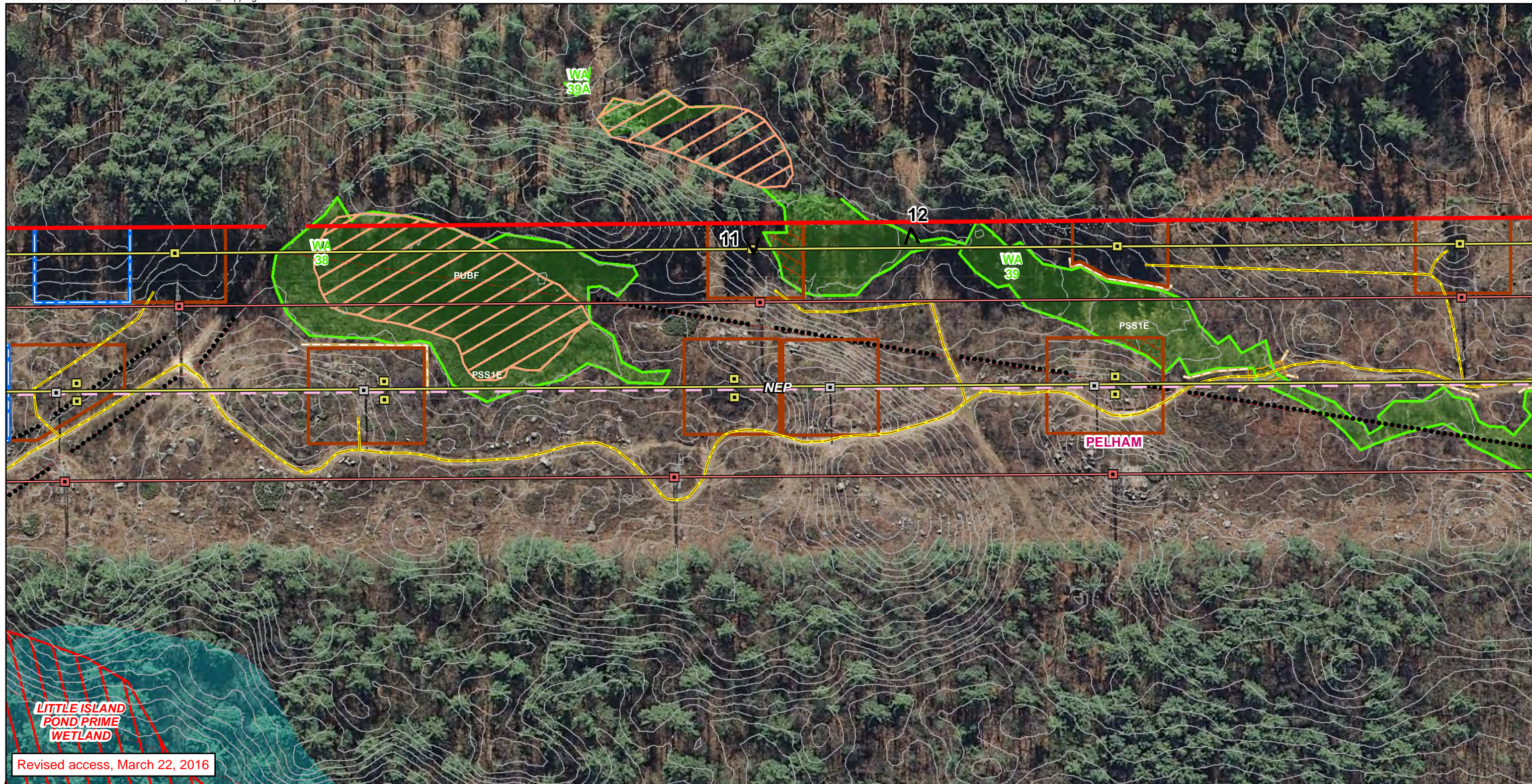
A handwritten signature in black ink that reads "Sherrie Trefry".

Sherrie Trefry, CSS
Director of Energy & Environmental Services

Attachments:

Attachment A - Revised Alteration of Terrain Permitting Plan Set, Sheets 35 and 36

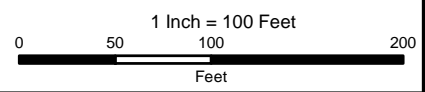
Attachment B - Draft Subdivision Plan for Pelham Mitigation Parcel



Revised access, March 22, 2016

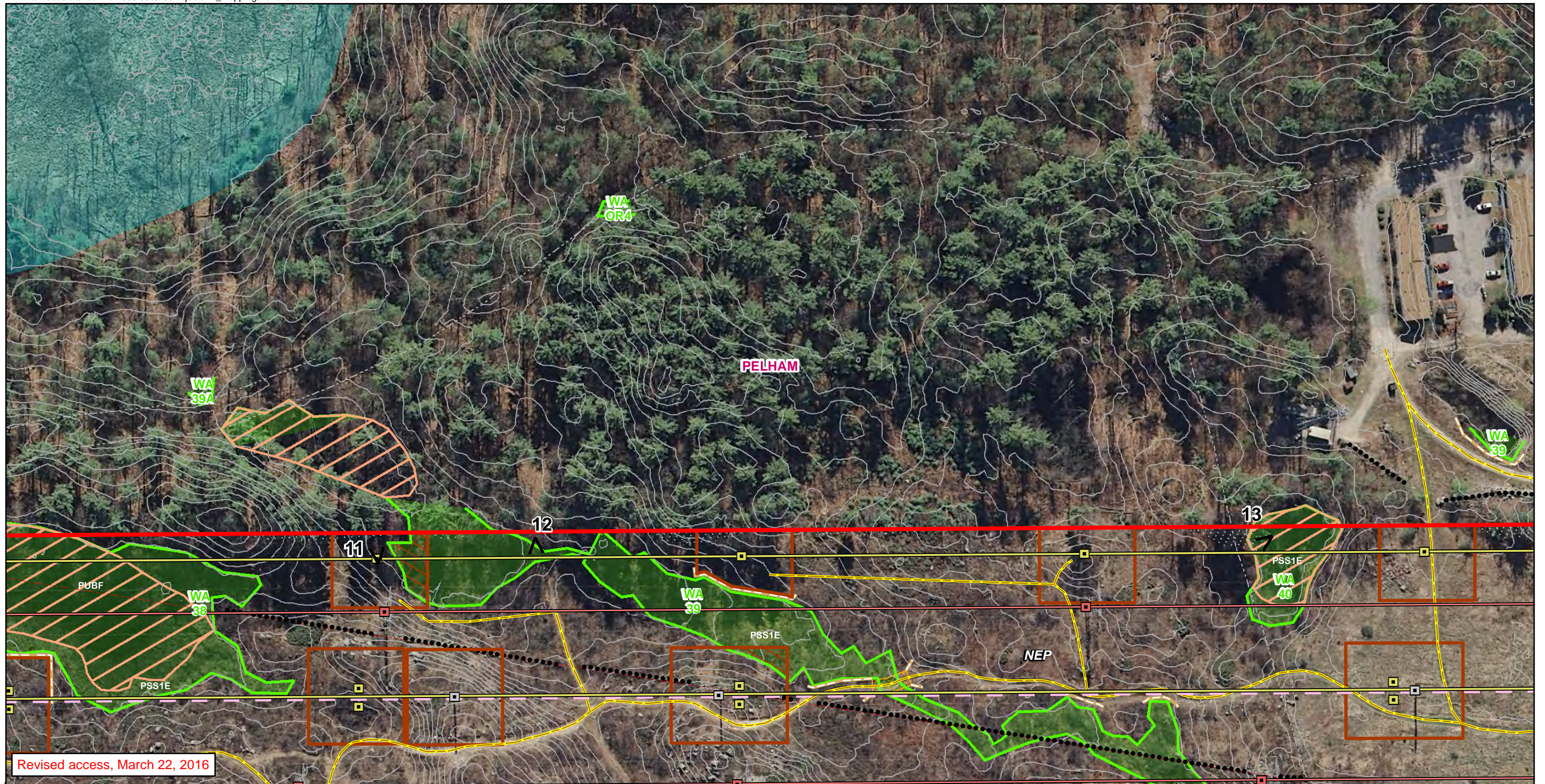


<ul style="list-style-type: none"> Existing Structure Existing Structure to be Removed Proposed Structure Proposed Guy Anchor Location Existing Transmission Line Existing Line to be Removed Proposed Transmission Line Surveyed ROW Boundary NEP Property Parcel Boundary Primary Access Alternate Access 	<ul style="list-style-type: none"> Gas Pipeline ROW Sewer Line ROW Delineated Wetland Edge Estimated Wetland Edge Wetland Resource Area Open Water Vernal Pool Delineated Perennial Stream Delineated Intermittent Stream Delineated Ordinary High Water 	<ul style="list-style-type: none"> USGS Stream FEMA 100-yr Floodplain 2-ft Elevation Contours Public Water Supply Well Construction Work Pad (100'x100') Pull Pad Site (100'x300') Guard Protection Area (50'x50') Swamp Mat Construction Work Pad Swamp Mat Access Proposed Permanent Crossing Laydown Area Stone Apron Existing Culvert Fence 	<ul style="list-style-type: none"> Stone Wall Erosion Control Tree Clearing Area Photo Location Town Boundary
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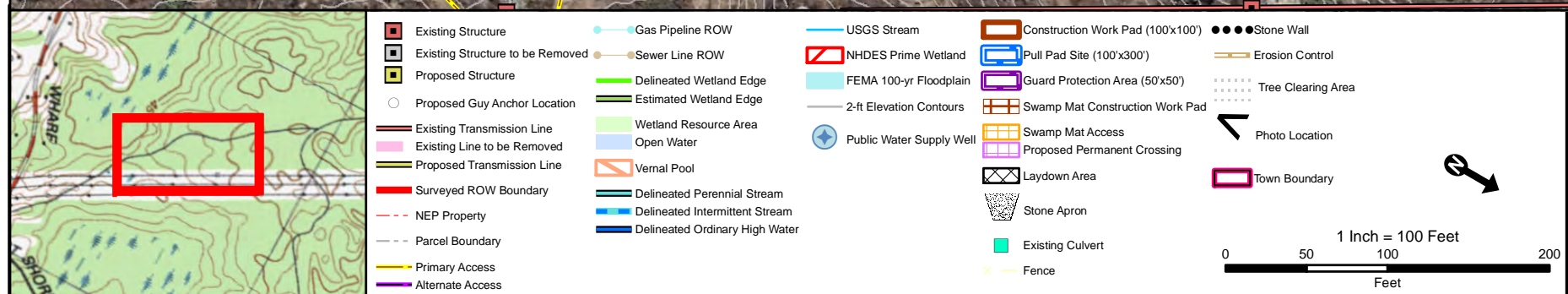


Alteration of Terrain Permitting Plans
 Merrimack Valley Reliability Project
 Tewksbury 22A Substation MA to
 Scobie Pond 345 kV Substation NH



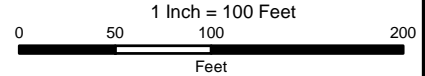


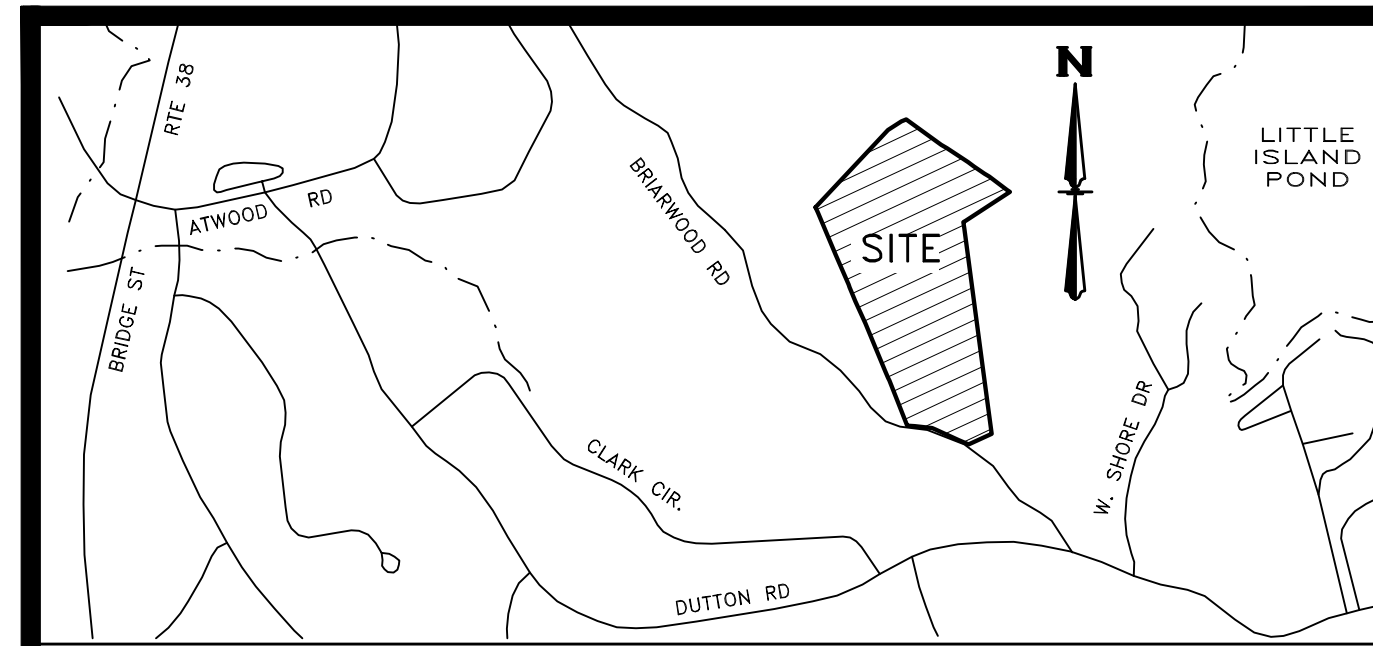
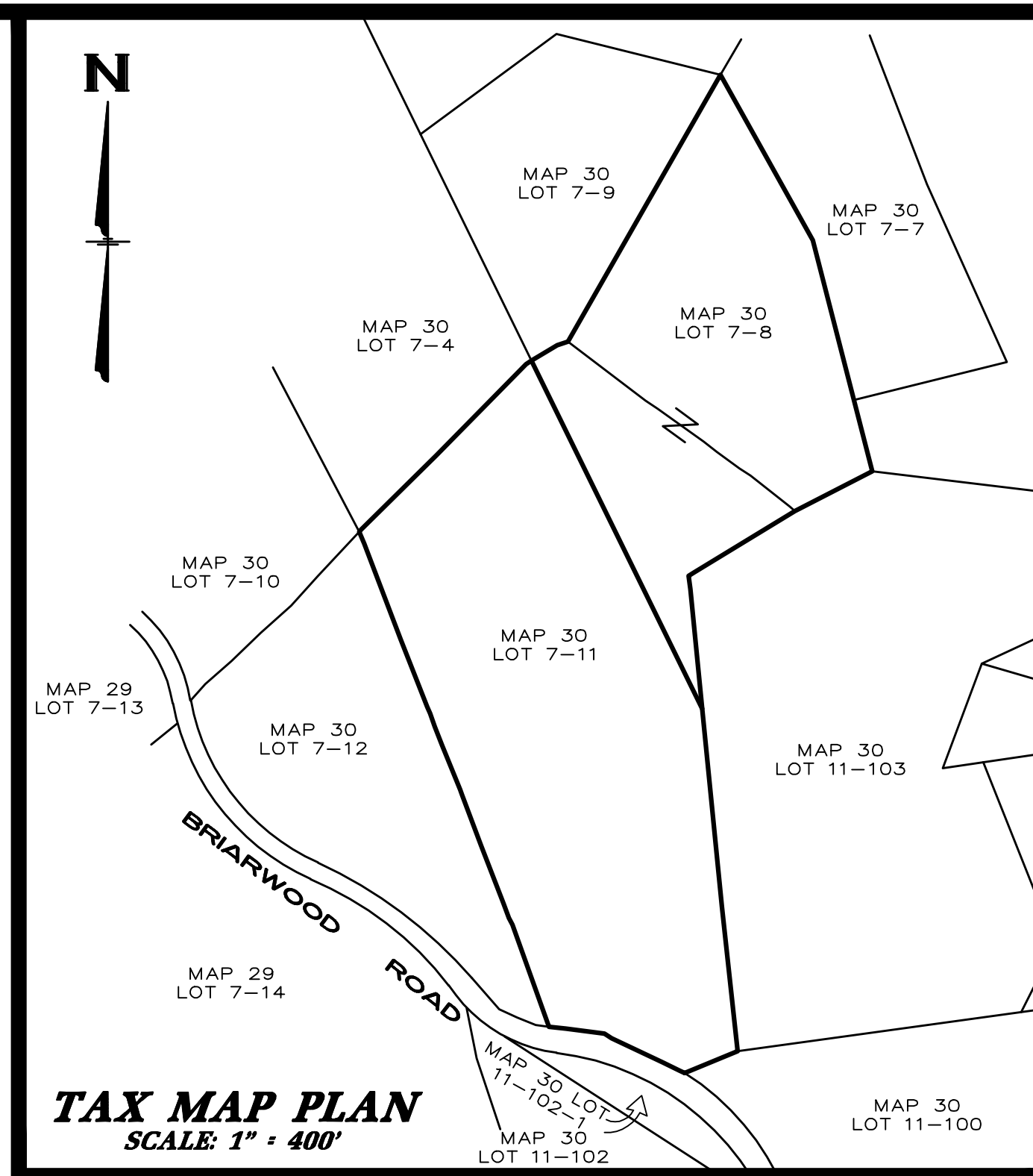
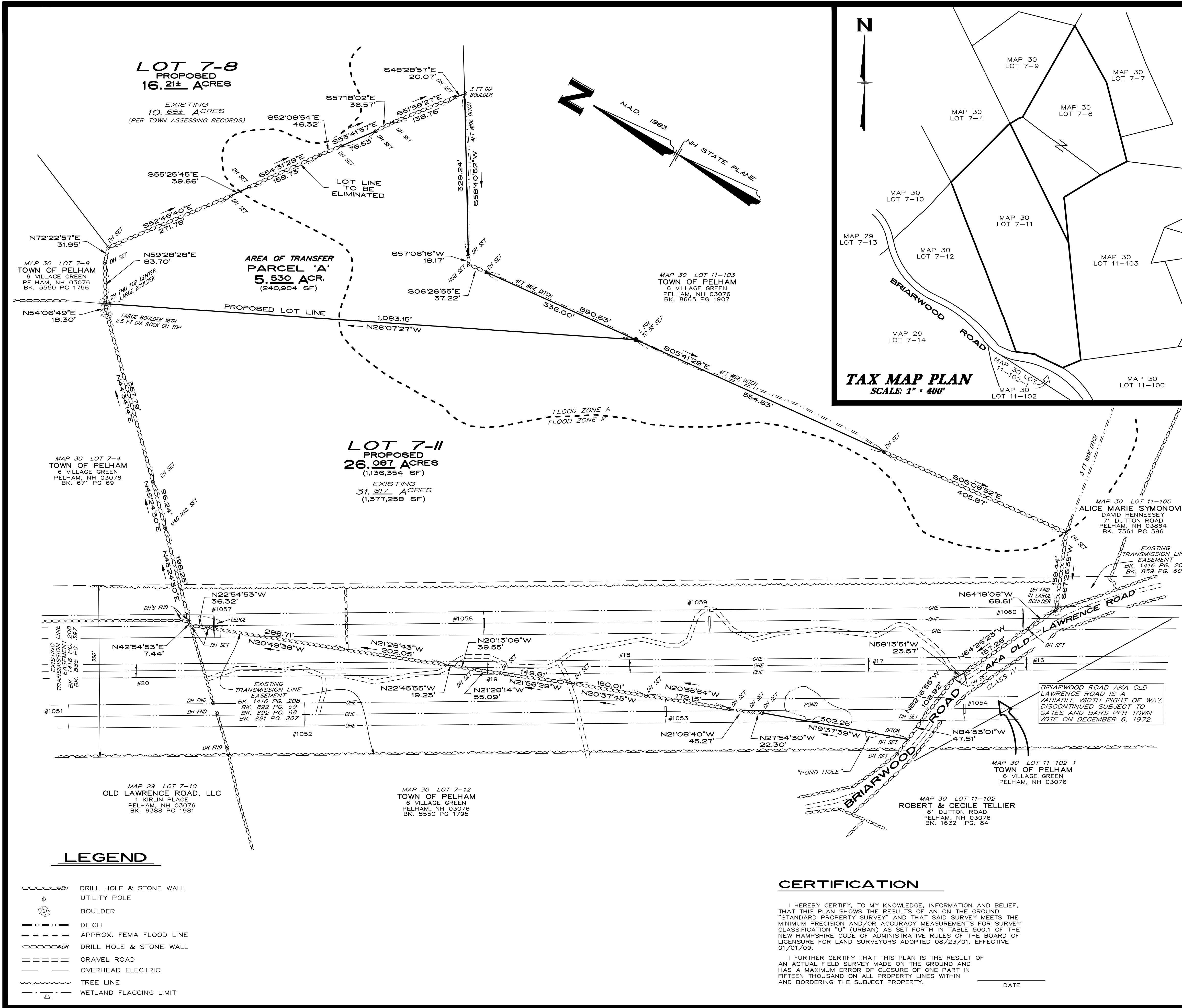
Revised access, March 22, 2016



Alteration of Terrain Permitting Plans
 Merrimack Valley Reliability Project
 Tewksbury 22A Substation MA to
 Scobie Pond 345 kV Substation NH

Source: NGRID, Black & Veatch, VHB, Beals & Thomas, Eversource, Normandeau





- PLAN REFERENCES:**
- 'SUBDIVISION PLAN' PLAN IN PELHAM, NH PREPARED FOR LEO RUSH BY STEVEN J. PATRICK, LLS DATED, AUGUST 24, 1993 HC RD PLAN No. 27667
 - ALTA/ACSM LAND SURVEY OF LOT 7-10 IN PELHAM, NH PREPARED FOR LEO M & LORELEI A. RUSH, PREPARED BY EDWARD N. HEBERT ASSOC., INC. DATED SEPTEMBER, 1996 SCALE: 1" = 50 HC RD PLAN No. 28192
- NOTES:**
- TOTAL SITE AREA:
LOT 7-11 31.617 ACRES (EXISTING)
26.087 ACRES (PROPOSED)
 - PRESENT ZONING: **R; RESIDENTIAL**
MINIMUM BUILDING SETBACK REQUIREMENTS:
- FRONT YARD 30 FT
- SIDE YARD 15 FT
- REAR YARD 15 FT
MINIMUM LOT SIZE 43560 SF
MINIMUM FRONTAGE 200 FT
 - LOT NUMBERS REFER TO THE TOWN OF PELHAM ASSESSORS MAPS 29 AND 30.
 - PURPOSE OF PLAN:
TO DEPICT A LOT LINE ADJUSTMENT BETWEEN LOTS 7-8 AND 7-11 TRANSFERRING PARCEL 'A' (5.53 ACRES) FROM LOT 7-11 TO LOT 7-8
 - A PORTION OF THIS PARCEL IS LOCATED IN A SPECIAL FLOOD HAZARD AREA A AS DETERMINED FROM THE FLOOD INSURANCE RATE MAP (FIRM), HILLSBOROUGH COUNTY, TOWN OF PELHAM, NEW HAMPSHIRE, COMMUNITY No. 330100, PREPARED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY, MAP NUMBER: 33011C0681D, DATED: SEPTEMBER 25, 2009.
 - PRESENT OWNERS OF RECORD:
LOT 7-11, MAP 30
NEW ENGLAND POWER CO
40 SYLVAN ROAD,
WALTHAM, MA 02451
BK. 1416 PG. 219
LOT 7-8, MAP 30
TOWN OF PELHAM
VILLAGE GREEN ROAD
PELHAM, NH 03076
BK. 1947 PG. 367

PRELIMINARY
FOR REVIEW ONLY

LOT LINE ADJUSTMENT PLAN
(LOT 7-11 AND 7-8, MAP 30)

BRIARWOOD ROAD

PELHAM, NEW HAMPSHIRE

PREPARED FOR:
~~MASSACHUSETTS ELECTRIC COMPANY~~
d/b/a NATIONAL GRID

40 SYLVAN ROAD WALTHAM, MASSACHUSETTS 02451
RECORD OWNER:
NEW ENGLAND POWER CO.
40 SYLVAN ROAD WALTHAM, MASSACHUSETTS 02451

SCALE: 1"=100 Feet
1"=30.480 Meters

18 JANUARY 2016

APPROVED BY THE PELHAM PLANNING BOARD

CHAIRMAN _____ DATE _____

SECRETARY _____ DATE _____

DATE OF APPROVAL _____

HSI Hayner/Swanson, Inc.
Civil Engineers/Land Surveyors
Three Congress Street Nashua, New Hampshire 03062-3301
Tel (603) 883-2057 Fax (603) 883-5057
www.haynerswanson.com

FIELD BOOK: 1209 DRAWING NAME: 5390FLB1 5390 1 OF 1
DRAWING LOCATION: Q:\5390 NGRID PELHAM\DWG File Number Sheet

CERTIFICATION

I HEREBY CERTIFY, TO MY KNOWLEDGE, INFORMATION AND BELIEF, THAT THIS PLAN SHOWS THE RESULTS OF AN ON THE GROUND "STANDARD PROPERTY SURVEY" AND THAT SAID SURVEY MEETS THE MINIMUM PRECISION AND/OR ACCURACY MEASUREMENTS FOR SURVEY CLASSIFICATION "U" (URBAN) AS SET FORTH IN TABLE 500.1 OF THE NEW HAMPSHIRE CODE OF ADMINISTRATIVE RULES OF THE BOARD OF LICENSURE FOR LAND SURVEYORS ADOPTED 08/23/01, EFFECTIVE 01/01/09.

I FURTHER CERTIFY THAT THIS PLAN IS THE RESULT OF AN ACTUAL FIELD SURVEY MADE ON THE GROUND AND HAS A MAXIMUM ERROR OF CLOSURE OF ONE PART IN FIFTEEN THOUSAND ON ALL PROPERTY LINES WITHIN AND BORDERING THE SUBJECT PROPERTY.

DATE _____

- LEGEND**
- DRILL HOLE & STONE WALL
 - UTILITY POLE
 - BOULDER
 - DITCH
 - APPROX. FEMA FLOOD LINE
 - DRILL HOLE & STONE WALL
 - GRAVEL ROAD
 - OVERHEAD ELECTRIC
 - TREE LINE
 - WETLAND FLAGGING LIMIT