



July 18, 2016

Christopher Hodge, Vice Chairman
Ammonoosuc River Local Advisory Committee
95 Dodge Rd
Littleton, NH 03561

Re: NH Site Evaluation Committee Docket No. 2015-06 Northern Pass Transmission and Public Service Company of NH - NHDES File #2015-02829 Northern Pass Shoreland Permit Application (Ammonoosuc River, Bethlehem)

Dear Mr. Hodge:

On behalf of Northern Pass Transmission LLC ("NPT"), we are responding to your January 11, 2016 comments to Pamela Monroe of the New Hampshire Site Evaluation Committee ("NHSEC"), which was copied to Darlene Forst at the New Hampshire Department of Environmental Services ("NHDES"), regarding the Northern Pass shoreland permit application referenced above. We agree that the Ammonoosuc River system provides important functions and values, but we disagree that Northern Pass threatens the river. We offer the following responses to your comments.

The Project will be located within an existing transmission ROW that currently crosses the Ammonoosuc River. Based on initial tree removal assessment, the existing ROW width does not need to be expanded. However, a stand of trees on the west side of the River will need to be removed. These trees provide no shade to the Ammonoosuc River, which is 100 feet away and over 100 feet wide in this location. Nevertheless, as with all tree removal in the ROW, the Northern Pass Project will be conducted to comply with Shoreland Water Quality Protection Act ("SWQPA") requirements to maintain root structures and understory growth wherever possible in the shoreland. There is no proposed tree clearing on the east site of the River.

Future vegetation maintenance will be performed pursuant to the Utility Maintenance Notification (UMN) (RSA 482-A:3, XV) permitting process for wetlands and streams and under the Permit by Notification (PBN) (RSA 483-B) permitting process for maintenance work within Shoreland areas. As noted above, such maintenance activities will also comply with the Best Management Practices Manual for Utility Maintenance in and Adjacent to Wetlands and Waterbodies in New Hampshire. This document can be found at <http://www.nhdf.org/library/pdf/Publications/DESUtilityBMPPrev3.pdf>. All vegetation maintenance work is by mechanical mowing, as it has been for many years. There may be circumstances where judicious use of herbicides to control invasive species is extremely beneficial, particularly where rare

plant communities are at risk. If herbicides were used in the future, it would be part of an Integrated Vegetation Management Program (IVMP). An IVMP utilizes target application of herbicides and does not spray in wetlands, waterways or within wellhead protection zones as dictated by NHDES.

Stormwater plans were submitted as required by NHDES for the nine site developments on the Project, including Transition Station 5 located on Miller Pond (Baker Brook Pond) in Bethlehem (SEC Appendix 6). Though stormwater plans were not required for ROW construction, the installation of structure foundations will be conducted following all construction BMPs, with required erosion and sedimentation controls, as described in the Alteration of Terrain application (SEC Appendix 6) and the Section 401 Water Quality Certification application (SEC Appendix 4). A draft Stormwater Pollution Prevention Plan (SWPPP) was also submitted with the Section 401 application, and will be finalized with the contractors as part of the National Pollutant Discharge Elimination System (NPDES) General Permit prior to construction.

The two proposed Northern Pass structures on the western side of the River in the shoreland zone are approximately 100 feet and 170 feet from the bank on the accreting side of the river bend, and will have no effect on the stability of the River. Additionally, the new structures will not cause any impact to the river system. The shoreland of the Ammonoosuc River in the vicinity of the ROW has significant historic anthropogenic impact including logging activity, gravel pits, ATV trails, railway and highway.

We believe the foregoing information addresses your comments, and appreciate the time and effort your organization has expended so far on the review of this Project.

Sincerely,



Lee E. Carbonneau
As agent for Northern Pass Transmission, LLC.
Senior Principal Scientist
Normandeau Associates, Inc.

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