



July 18, 2016

Cheryl Jensen, Chair
Bethlehem Conservation Commission
P.O. Box 189
Bethlehem, NH 03574

Re: Letters dated May 12, 2016 and May 17, 2016 to NHDES and Testimony from Cheryl Jensen, Chair, Bethlehem Conservation Commission on Monday, March 14, 2016 before the NH Site Evaluation Committee on the Northern Pass Project.

Dear Ms. Jensen:

On behalf of Northern Pass Transmission LLC ("NPT"), we are responding to comments in your letters dated May 12 and May 17 to the New Hampshire Department of Environmental Services ("NHDES") and public comments on March 14, 2016 before the New Hampshire Site Evaluation Committee ("NHSEC") regarding the Northern Pass Project. We respectfully disagree with the assertion that the Project's application is incomplete, and the assertion that the Project has underestimated potential environmental impacts along the Project route in Bethlehem and elsewhere. In addition, we offer the following responses to your comments.

Impacts Associated with Transition Station #5

Permanent and temporary impacts, including fill in wetland areas, associated with the construction of the proposed Transition Station #5 have been fully accounted for in the Project's NHDES Wetlands Permit Application ("WPA") and U.S. Army Corps of Engineers Application for Department of the Army Permit, Section 404 ("404 Permit"). These documents are included as Appendices 2 and 3, respectively, to the SEC Application. A statement in the Wetlands, Rivers, Streams, and Vernal Pools technical report (Appendix 31 to the SEC Application) referring to the proposed relocation of Transition Station 5 was inadvertently left in the report from an earlier version. Transition Station 5 was moved north from a site along Route 18 to allow the burial of an additional 3 miles of the Project, thereby further minimizing visual and environmental impacts. All required surveys associated with this design change were completed and included in Project reports and applications. Existing conditions, construction methods, proposed impacts and mitigation measures are detailed and summarized in Sections 6 and 7 of the WPA and Sections 2 through 5 of the 404 Permit; details are also contained on plans submitted with the WPA and 404 Permit and as Appendix 47 to the NHSEC application.

Temporary Impacts from Staging and Laydown Areas and Access Roads

Proposed temporary natural resource impacts associated with all known on-ROW access roads, off-ROW access roads (“ORARs”), and proposed temporary laydown or staging areas have been included in the applicable state and federal permit applications, including the WPA and 404 Permit. Access roads and temporary storage and staging areas are discussed in Sections 6.1.15 and 6.1.16 of the WPA, and all proposed temporary impacts associated with these components of the project are included in tabulations and summaries. These areas are also discussed in Sections 3.4 and 3.5 of the 404 Permit with any proposed impacts included in Section 4. Details are also contained on the plans submitted with the WPA and 404 Permit applications and as Appendix 47 to the SEC Application. The location of, and proposed impacts associated with, access roads and temporary storage and staging areas located within lands owned or controlled by the Project have been included at this time; however, sites that may be identified in the future or where a formal agreement for use has not been completed or does not exist have not been included. Any access roads or storage and staging areas identified in the future will be subject to the same avoidance and minimization standards and protocols that have been applied to the remainder of the Project; and no impacts will be allowed unless explicitly permitted by NHDES.

Natural Resource Impacts to Adjacent/Surrounding Areas

Contrary to the assertion that impacts will extend far beyond the limits of the ROW, no impacts will occur beyond the ROW based on the following measures the Project has implemented and will implement. Access and structure siting, design, and construction methodologies, proactive erosion prevention and sediment control (EPSC) measures, and restoration protocols will ensure that disturbances are restricted to the specific areas affected. EPSC measures will be installed prior to any soil disturbance and maintained and inspected regularly to ensure compliance and effectiveness. No permanent impacts to streams are proposed in Bethlehem, and temporary impacts to streams will be primarily associated with bridging thereby limiting or eliminating disturbance to the channel; in addition existing crossings and other access routes that are present within the existing ROW areas within Bethlehem will be utilized where possible. Construction and operational stormwater runoff associated with Transition Station #5 will be managed and controlled based on the requirements of the NH Stormwater Manual and applicable state and federal standards, thus preventing off-site water quality effects. Lastly, all temporarily disturbed areas will be restored following site-specific protocols and will meet the applicable standards.

Proposed impacts to natural resources have been avoided and minimized within the Town of Bethlehem to the greatest extent practicable, and have been limited to previously disturbed and

developed lands associated with the exiting transmission line ROW, formerly developed parcels and existing public roads.

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

Sincerely,



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As agent for Northern Pass Transmission, LLC.
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