



July 18, 2016

Janet F. Cote, Chair  
Bristol Conservation Commission  
230 Lake Street  
Bristol, NH 03222

Re: Comments, NH Site Evaluation Committee Docket No. 2015-06- Joint application of Northern Pass Transmission, LLC and Public Service Company of New Hampshire dba Eversource Energy

Dear Ms. Cote:

On behalf of Northern Pass Transmission LLC ("NPT"), we are responding to your comments to Pamela Monroe of the New Hampshire Site Evaluation Committee ("SEC") and Collis Adams of New Hampshire Department of Environmental Services ("NHDES") (stamped as received on January 19, 2016) regarding the Northern Pass Project.

*Proposed Mitigation*

We would like first to provide some important information regarding wetland impact assessment and mitigation. After extensive efforts to avoid and minimize impacts to wetlands and other natural resources, the unavoidable impacts for the project were quantified in accordance with state and federal agency requirements. Temporary impacts will be restored in place, in compliance with state and federal requirements.

The process for identifying and evaluating compensatory mitigation options for permanent and secondary impacts also followed state and federal protocols. Mitigation opportunity research and outreach were important components of this process, and we acknowledge the effort that the Town of Bristol made to provide a local project in response to our outreach. As described in Section 5 of *Northern Pass Transmission Project: Natural Resource Mitigation Plan* (SEC Application Appendix 32), local projects were evaluated by the Project team and state and federal regulatory agencies for relevance to Northern Pass impacts, project design status and cost, and consistency with regional conservation priorities. Your project was determined to be an unsuitable match based on its location in a different watershed than Northern Pass, a project type different from the primary impact type, and cost over three times greater than the calculated Aquatic Resources Mitigation fund payment of \$67,641.20 that would be appropriate for the level of wetland impact in Bristol.<sup>1</sup> This decision in no way indicates that your project is not important, worthwhile, and well-planned; rather it simply

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<sup>1</sup> Please note that the NPT has proposed and NHDES will require a substantial ARM Fund payment as part of the Project's mitigation package. The payment will be made to the NHDES, and not to individual towns. NHDES follows a competitive grant process in deciding how the ARM Fund is to be used.

means that it is not a match for the impacts that NPT needs to mitigate. Please also note that preservation of a 40-acre parcel of land in New Hampton with almost a mile of Pemigewasset River shoreline is also part of NPT's mitigation package.

*Bristol Zoning Ordinance: Wetlands Conservation Overlay District*

Thank you for sending along the Town's wetlands ordinance. We are confident that NHDES and the SEC will review carefully the extensive wetlands application material that has been submitted for this Project and consider the extent to which NPT has achieved wetland and natural resource avoidance and impact minimization in Bristol and all other communities along the route.

We believe the foregoing information addresses the comments expressed in your letter to NHDES, and appreciate the time and effort your Commission 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.

CC: Mr. Collis Adams (collis.adams@des.nh.gov)  
Mr. Craig Rennie (craig.rennie@des.nh.gov)  
Ms. Pamela Monroe, Administrator- NH Site Evaluation Committee  
(pamela.monroe@sec.nh.gov)