



July 18, 2016

Jessica Tabolt Halm  
Campton Conservation Commission  
12 Gearty Way  
Campton, NH 03223

Re: Comments, Wetland File No. SEC-2-15-02817 and Shoreland Application

Dear Ms. Halm:

On behalf of Northern Pass Transmission LLC ("NPT"), we are responding to your May 9, 2016 email to Craig Rennie and Darlene Forst of the NH Department of Environmental Services ("NHDES") related to the Northern Pass Project. We acknowledge your comments regarding the location of the underground line within the Route 3 corridor in Campton, along with the proximity of the road to sensitive resources and appreciate the notice regarding additional work in the area of Livermore Falls. We can assure you that the geotechnical work currently proposed is normal in the course of designing a utility project, such as Northern Pass. The geotechnical work is being conducted under separate and limited permits just for geotechnical borings. It is for informational purpose and does not constitute any progress prior to receiving the necessary construction permit authorizations.<sup>1</sup> In addition, we provide the following responses to your comments.

*Pending Geotechnical Surveys along Route 3 Underground Route*

No construction work can or will happen until the necessary state and federal construction permits are approved. Contacting 811 Dig Safe in New Hampshire prior to any proposed geotechnical investigations as part of project design is required by state law (Chapter 374:48). Geotechnical investigations are necessary for project design and have been permitted separately. The Project engineers will finalize the design of the underground route based on refined geotechnical data. All work will be performed according to applicable best management practices (BMPs), which include measures to protect wells and other infrastructure. Since the underground cable is proposed to be placed in the disturbed roadbed or shoulder, NPT is expecting minimal impacts to adjacent trees and landscaping, as this area is typically devoid of this sort of vegetation and maintained as such to support normal New Hampshire Department of Transportation (NHDOT) operations and

---

<sup>1</sup> RSA 162-H:2 III specifically provides the following: "Commencement of construction" means any clearing of the land, excavation or other substantial action that would adversely affect the natural environment of the site of the proposed facility, but does not include land surveying, optioning or acquiring land or rights in land, changes desirable for temporary use of the land for public recreational uses, or necessary borings to determine foundation conditions, or other preconstruction monitoring to establish background information related to the suitability of the site or to the protection of environmental use and values." (emphasis added)

maintenance. Should tree roots be encountered, NPT intends to take the following steps to ensure that trees are not damaged during construction. Prior to construction, a certified arborist will inspect the proposed route and identify those trees that have potential for roots to be located in the shoulder or under the pavement. The arborist will also prepare appropriate protection guidance for construction crews to follow at these identified locations. Such guidance method may consist of the following steps: 1. careful exposure of root system by hand digging or air knife technology, 2. appropriate pruning of roots where necessary, 3. wrapping of roots with burlap or other appropriate material and tying back to the side of the trench, and 4. after duct bank installation, the roots will be untied and buried back to their original location.

#### *Sensitive Resources Adjacent to Route 3*

As discussed above, the proposed underground cable will be placed in the disturbed roadbed along Route 3; therefore, negative impacts to adjacent natural resources including wetlands are not anticipated. Wetlands near the work area will be reflagged prior to construction and silt fence or other erosion and sediment control BMPs will be installed as a barrier to sediment and equipment. Environmental monitors will oversee the work to insure that adjacent resources are adequately protected, all BMPs are being followed, and all permit conditions are met.

#### *Stream Crossings in Campton*

Culverted streams will be crossed by placing the cable under the existing culvert, which will be supported and protected during construction work. Streams that are in an open-bottomed culvert or are bridged will be crossed well under the streambed by directional drilling or jack and bore technology (both trenchless construction methods using standard practices designed to avoid and minimize any impacts to the waterbody). West Branch Brook and Bog Brook are examples of larger drainages where trenchless underground methods will be employed with substantial setback on either side of the proposed crossing. While we can appreciate that you are concerned over possible negative effects, performance of these activities by experienced contractors complying with regulatory requirements and using well designed practices while being overseen by environmental monitors will help insure the work is performed in a manner that avoids impacts.

#### *Coordination with Other NHDOT Work*

NPT will be coordinating work with other projects and entities to minimize schedule conflicts, in particular the NHDOT along underground portions of the Project. Trenching in any one location will not last more than a few weeks, so limited disruptions are anticipated even if the two projects happen to overlap in time and location. We appreciate being notified in advance of the proposed upcoming work in the area of Livermore Falls.

#### *Nature of Impacts*

Energy projects of all sizes have some impact on natural resources, but the impacts of this Project are minimal relative to its size and are fully mitigated as required by law as demonstrated in the Natural Resource Mitigation Plan (Appendix G to the NHDES Wetland Permit Application ("WPA"), and Appendix 32 to the SEC application). The Project's WPA and the SEC application generally address

the extensive impact avoidance efforts made by the Project. In addition, the SEC application especially addresses the many environmental and economic benefits of the Project.

We believe the foregoing information addresses the comments expressed in your email of May 9 regarding underground construction of the line within Campton. We 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. Darlene Forst (darlene.forst@des.nh.gov)  
Ms. Pamela Monroe, Administrator- NH Site Evaluation Committee  
(pamela.monroe@sec.nh.gov)