



July 18, 2016

Todd Piskovitz
Project Review Subcommittee Chair
Lamprey Rivers Advisory Committee
203 Wadleigh Falls Road
Lee, NH 03861

RE: Wetlands File No. SEC -2-15-02817 – Northern Pass Transmission Permit Application –
Response to LRAC Comments Submitted to NHDES on November 9, 2015

Dear Mr. Piskovitz:

On behalf of Northern Pass Transmission LLC (“NPT”), we are responding to your November 9, 2015 comments to Dori Wiggin, Craig Day and Ridge Mauck at NHDES on the Northern Pass permit applications referenced above. Your letters include some specific concerns about access and structure placement, and also describe the findings of a field review conducted by the Lamprey Rivers Advisory Committee (“LRAC”) at two sites in the ROW that Eversource/PSNH had worked on under previous wetland permits for which Normandeau Associates Inc. was the agent. We provide the following responses to your comments.

The wetland protection strategies described in the permit application materials for the Eversource projects referenced by LRAC (NHDES wetland permits 2013-02154 and 2014-02334) were rigorously applied to those Eversource projects, and the construction monitoring reports were provided to Eversource and NHDES. A snapshot of an existing gravel road in a ROW near Church Street showing recent sediment displacement by a wheeled vehicle (see attached photo taken by LRAC on October 29, 2015 and provided to Dori Wiggin) is unrelated to Eversource construction work over a year prior to that date (see attached photo taken by Normandeau Associates, Inc. on June 2, 2014). The temporary timber mats, silt fence and straw wattles shown in the Normandeau photo were installed and functioned as designed, and upon removal, the wetlands were restored as required by the project permits. However, the wetland protection methods employed by Eversource projects do not apply to the many other users of the ROW and access roads on these private properties. Eversource does not have the right to prevent access to private property, and the company is not responsible for ATV use or other access issues in the ROW if owned by others. Many portions of the existing ROW are utilized by the public, with some activities including unregulated ATV and other similar uses resulting in erosion and sedimentation problems. These unregulated activities often take place in locations previously restored following ROW maintenance or construction activities.

Where possible, Northern Pass construction access paths will follow existing roads to minimize new impacts, as long as those paths provide access to the necessary locations, have suitable slopes, turning radii, wire clearance, etc., and avoid sensitive resources. West from Church Street, the existing access road passes through a vernal pool as shown on the permitting plan set. Since construction of the Northern Pass Project will span two years, a different route was chosen to avoid this vernal pool.

Access to the ROW from Mountain Road, the second site mentioned by LRAC, was also used for one of the prior permitted Eversource projects (the other Eversource project which proposed to use this access road was instead completed by helicopter). Normandeau provided construction monitoring to ensure that BMPs were either installed in accordance with the plans, or revised based on field data that was reviewed and approved by the Eversource project team. During the project work in 2014, no wetland impacts or BMP failures were noted in this area. The access road clearly appears as a gravel road on aerial photos as far back as at least 1992. Historical and current aerial photos clearly show trails with wheel tracks leaving the ROW onto adjacent properties, and it is likely that ATVs use these access roads regularly. Nonetheless, Northern Pass contractors will need to improve this access path to provide a stable base for construction use. All necessary erosion and sedimentation control BMPs will be installed and maintained throughout the duration of construction activity in this, and all other locations.

Northern Pass will employ construction monitors to verify compliance with all impact avoidance and minimization commitments, permit conditions, and post-construction monitoring to verify successful restoration. In addition, the Project expects that the state and federal agencies will perform independent inspections of the work. Northern Pass will cooperate fully with all regulatory reviewers.

One of the proposed structures will be located approximately 245 feet from the edge of the Lamprey River, which is no closer than the existing structures in the ROW. This new structure will have no impact on the Lamprey River. However, shifting its location could have a ripple effect along the line that could create greater impacts to natural resources elsewhere.

Structure foundations will be designed specifically to suit each structure location based on geotechnical information that will be gathered over the coming months. The assumptions included in the Project permit applications are conservative enough to cover the possible foundation sizes and configurations. Based on these assumptions, the permanent impact to wetlands from structure foundations in Deerfield is 483 square feet. In many locations, we expect that the foundations will have even less impact than is identified in the application materials.

We believe the foregoing information addresses the comments raised in your letters. We appreciate the time and effort your organization has expended on the review of this Project.

Sincerely,



Lee E. Carbonneau
As agent for Northern Pass Transmission, LLC.
Senior Principal Scientist
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Photo taken by Normandeau, June 02, 2014



Photo taken by LRLAC 10/29/2015