NORMANDEAU ASSOCIATES
Environmental Consultants

July 18, 2016

Max Stamp, Chair
Pemigewasset River Local Advisory Committee
2110 Summer St.
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 Mr. Stamp:

On behalf of Northern Pass Transmission LLC ("NPT") we are responding to questions and comments in your e-mail dated May 9, 2016 on behalf of the Pemigewasset River Local Advisory Committee ("PRLAC") and addressed to Darlene Forst and Craig Rennie of NH DES related to the Northern Pass Project. In addition to the over 46 answers provided by Northern Pass in response to discovery related data requests served on Northern Pass by PRLAC as an intervener in the NH Site Evaluation Committee ("SEC") docket on the Northern Pass Project, we offer the following responses to your comments.

Pemigewasset River Crossings
Additional tree removal associated with 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. Although vegetation must be kept low for safety and reliability reasons, maintaining root structure and allowing low growth vegetation will help protect the river banks from erosion. Proposed structures have been moved back from the reference line of all Designated Rivers to the extent practicable, but nearby wetlands, streams, roads, topography, and span limitations also limit the range of structure placements. Relocations can have ripple effects on the location and size of adjacent structures which can result in greater impacts.

Northern Pass and Eversource NH will avoid and minimize potential impacts in the ROW from ongoing maintenance activities through their compliance with the Best Management Practices Manual for Utility Maintenance in and Adjacent to Wetlands and Waterbodies in New Hampshire (Interim January 2010), or future revisions, which was approved by NHDES. This document can be found at http://www.nhdfl.org/library/pdf/Publications/DESUtilityBMPrev3.pdf.

Tree Removal Along Existing ROW
Tree removal within the existing transmission ROW has been avoided where practicable and will be done only to the extent required to meet safety requirements. The proposed extent of tree removal for Northern Pass is shown on the wetland permitting plans. Where it could not be avoided in wetlands,

vernal pool buffers, and stream buffers, tree removal may result in a change in functions and potentially a reduction in habitat values. These impacts have been quantified and addressed in the Natural Resource Mitigation Plan (SEC Appendix 32). Although some minimum tree removal is necessary, the removal will allow the expansion of meadows, shrublands, and early successional forest that already exist and are maintained in the ROW. Such habitat is of high value to many wildlife species that are rare or are becoming rare as these early successional habitats disappear from our landscape. In your region of the state, examples of such species include, among others, the eastern towhee, field sparrow, prairie warbler, wood turtle, and many insect pollinators.

The potential impact of tree canopy removal on stream temperatures and cold water fisheries was evaluated for all perennial streams greater than 1-foot in width, and the results, described in the Fisheries and aquatic Resources Report (SEC Appendix 33), indicate that impact will be minimal. Nonetheless, Northern Pass intends to provide shrub plantings along streams where riparian vegetation may be disturbed by temporary access crossings, thereby restoring streambank stability and shade. At the request of NH Fish & Game Department, Eversource is evaluating locations in the ROW where taller vegetation in ravines can be left without safety or reliability risks.

Climate Change/Stormwater Runoff/Groundwater

We disagree with the conclusory assertion that Northern Pass will measurably increase stormwater runoff or reduce groundwater supplies. Northern Pass will comply with all stormwater related requirements associated with Alteration of Terrain, 401 Water Quality Certificate, and NPDES requirements. Once restored, the ROW will remain pervious and vegetated. That natural state would not contribute to stormwater runoff or climate change as your letter would appear to argue. Instead, the Northern Pass Project will reduce greenhouse gas emissions by over three million tons a year, and help New Hampshire achieve the goals of the NH Climate Action Plan and the Regional Greenhouse Gas Initiative.

Wetlands

The route selected through the Pemigewasset watershed is entirely within existing transmission or road ROWs, and the plans were reviewed and revised multiple times in an effort to avoid and minimize resource impacts where possible. The extensive effort to avoid and minimize impacts is detailed in the Natural Resource Mitigation Plan (SEC Appendix 32). After restoration efforts are complete, the wetlands disturbed by the temporary impacts of construction will resume functioning. Ongoing maintenance activities will be similar to the activities conducted currently, which have not resulted in the "permanent destruction" of wetlands in the ROW. 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.

Permanent unavoidable wetland impacts associated with structure foundations are addressed in the compensatory mitigation plan, which complies with state and federal mitigation rules. The mitigation percentages for secondary impacts are specified by the USACE and the USEPA. New Hampshire wetland regulations do not require mitigation for secondary impacts, so the proposed mitigation for secondary impacts automatically exceeds state requirements. Compensatory mitigation is not required for temporary impacts, as these are required by state and federal regulation to be restored in place. Mitigation is required for 100% of permanent wetland impacts. The compensatory mitigation plan submitted by Northern Pass exceeds even the higher federal mitigation ratios, thereby greatly exceeding what NHDES requires.

Finally, as part of the SEC process, the Northern Pass team, including engineers and environmental scientists, provided tours of the Project route to SEC members and interested intervenors in 2016, and is open to providing additional tours of the Project area as requested by the SEC. We believe the foregoing information addresses the comments raised in your email correspondence of May 9, 2016, and appreciate the time and effort your Committee 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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