



August 8, 2017

Serita Frey, Chairperson and Katherine Hartnett
Deerfield Conservation Commission
PO Box 230
8 Raymond Road
Deerfield, NH 03037

Re: NHDES File 2017-01534 - Wetlands Permit Deerfield Substation – Response to Deerfield Conservation Commission Comments

Dear Ms. Frey and Ms. Hartnett:

On behalf of Northern Pass Transmission LLC (“NPT”), we are respectfully responding to your e-mail of June 14, 2017 to Mr. Craig D. Rennie of the NH Department of Environmental Services (“NHDES”) related to NHDES File 2017-01534 - Wetlands Permit Deerfield Substation. This application associated with the Northern Pass Project is for the excavation of two test pits for collecting data relevant to the final design of the proposed Deerfield substation expansion. Attached are your comments with our responses relevant to the subject of this wetland application.

Sincerely,

A handwritten signature in cursive script that reads "Lee E. Carbonneau".

Lee E. Carbonneau
As agent for Northern Pass Transmission, LLC.
Senior Principal Scientist
Normandeau Associates, Inc.

Attach.

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)

FROM: Deerfield Conservation Commission, 14 Jun 17

RE: NHDES 2017-01534 Deerfield Substation Wetlands Permit

BASIS FOR DCC COMMENTS: DCC writes as a seasoned commission familiar with wetlands review process, and supported by qualified volunteers from the Planning Board, and the community, with the following objections to a pro forma approval of this Wetlands Application:

- DES has received a series of complaints documenting previous violations by Eversource/NPT contractors from Jim Page (20, 21, and 28 Nov 2016) that should be addressed first. Copies of correspondence are available from DCC if needed.

Response: Normandeau's response to the issues raised in Mr. Pages November 20 and 21 comments were attached to the DCC email. Normandeau submitted a final inspection report to NHDES after the completion of the geotechnical boring work and restoration at the Deerfield Substation Expansion site. We have no further response. The work in Kinsman Notch was also addressed by Northern Pass, and determined by NHDES and USFS to comply with relevant regulations and standard practices. We have no further response. I am unfamiliar with Mr. Page's comment about a wetland crossing at the "Reed Yard", as this would not be related to Northern Pass.

The Nov. 28 comment from Mr. Page is not a complaint, but a request for information from NHDES. I do not know if Mr. Page followed the instructions provided by Mr. Blecharczyk for obtaining information from the project file. Attached is a copy of the 10/20/16 letter sent by Normandeau notifying the Deerfield CC and NHDES about the start of the geotechnical work. The permit was on site with the contractor and with the Normandeau monitor.

- In written testimony and during NPT testimony, Mr. Quinlan repeatedly assured all that Avoidance, Minimization, and Mitigation (AMM) and Best Management Practices (BMP) would be followed for all NPT related work. They have not been, as also documented in email exchange between Lee Carbonneau of Normandeau and Craig Rennie of DES (15 Nov 16 attached), and Mr. Page's 31 May 17 complaint.

Response: We believe the Normandeau email response of 15 November 2016 adequately describes the process of selecting and implementing Best Management Practices (BMPs) given the changing environmental conditions during the geotechnical work period. We also expect that the contractors will consider their past experiences when implementing BMPs for all future work, including test pit excavation. But we also acknowledge that construction activities involve some temporary impacts, which must and will be restored.

- The photos in the May 17 application are in stark contrast with the photos provided by Mr. Page.

Response: The wetland photos included in the Wetland Application for test pit work show the wetlands that will be affected by the proposed work, as required. These were taken after completion of the geotechnical work, and reflect the restored condition of the wetlands, as appropriate for the new application. As noted above, any areas temporarily impacted by construction activities must be restored.

(2) SUGGESTIONS TO ADDRESS PERFORMANCE ISSUES:

- Arrange a joint DES/DCC site visit to DSS prior to any work beginning to document conditions.

Response: *While Northern Pass and its contractors will cooperate on this, it is an issue for DES to address.*

- Coordinate work schedule with Town Boards & abutters, before and during work.

Response: *Northern Pass has made, and will continue to make, all required notifications for Northern Pass-related work as specified in permit application instructions and permit conditions. This includes abutter notifications of the permit application submittal, and NHDES and Conservation Commission notification of work not less than five days prior to the start of work activities.*

- Wildlife are moving, and it is nesting season. Hire Mark West as an independent wetlands monitor to work with crews while on site to ensure all wildlife are safely removed and not harmed by contractor activity.

Response: *DES can retain contract services as it determines necessary. But, Northern Pass has contracted with Normandeau Associates to monitor and report on the test pit work.*

- Crews photo document effective BMP performance and send report to DES & DCC.

Response: *Northern Pass has contracted with Normandeau Associates to monitor and report on the test pit work. A final monitoring report will be submitted to NHDES, and others as required by the permit conditions. A copy of the final monitoring report submitted to NHDES for the geotechnical borings completed last fall is also available at NHDES.*

(3) SUGGESTIONS TO CORRECT PAST DAMAGE:

Response: *The only Northern Pass work that has taken place to date is the geotechnical borings. Any temporary impacts associated with the geotechnical borings have been restored, and there is no damage to correct.*

- Removed tree and other debris from wetlands and flowages.

Response: *We are not aware of trees and debris left in wetlands and flowages associated with the geotechnical work.*

- Reestablish minimum 100 foot vegetated buffers to wetlands and surface water flow.

Response: *In accordance with the wetlands permit conditions and wetlands rules, temporarily disturbed areas are stabilized with wetland or upland seed mix and erosion control materials (straw or erosion control blankets) where appropriate. This approach will be taken for the test pit work also.*

- Add plantings to buffer industrial uses from surrounding land using Integrated

Landscaping Practices

Response: *Again, the subject of this wetland application is the temporary impact to wetlands for exploration of soils in two test pits. The DCC appears to be making recommendations regarding the construction of the Deerfield Substation that are unrelated to the application at hand.*

(4) FUTURE SITING: The location of the new DSS has significant ramifications for the ecological integrity of the site, the adjacent Great Brook Trail Corridor and wildlife connectivity on through the Curry Easement to Pawtuckaway State Park, as well abutting Dowst Cate Town Forest, and many residential abutters. DCC respectfully requests that in addition to geotechnical considerations, ESource/NPT meet with all stakeholders to discuss DSs location prior to a decision. The goal of such a meeting would be to optimize DSS siting, incorporating considerations of:

- Subsurface conditions (from geotech borings and other engineering field data)
- Wetlands location and condition
- Operating characteristics
- Minimizing visual and auditory impacts to abutters and neighbors

Response: *See responses to Number 3, above. The application at hand is for the excavation of two test pits. Issues pertaining to the siting of the DSS should be addressed under that application.*

October 20, 2016

Serita Frey, Chairperson
Deerfield Conservation Commission
P.O. Box 230
8 Raymond Road
Deerfield, NH 03037

Mr. Craig Rennie
NHDES Wetlands Bureau
P.O. Box 95
Concord, NH 03302-0095

Re: Wetland File No. NHDES 2016-02471 - NPT Deerfield Substation Geotechnical Borings

Dear Ms. Frey and Mr. Rennie:

On Behalf of Northern Pass Transmission, LLC, (Northern Pass), and in compliance with the permit conditions for NHDES Permit 2016-02471, we are notifying you that work related to the geotechnical borings at the proposed Deerfield Substation expansion area will begin on October 28, 2016. On that day, the contractors propose to mow the access route to the site through the existing Eversource ROW. The drilling of the geotechnical borings is scheduled to begin on October 31, 2016. A Normandeau scientist will be on site to monitor work in wetlands and search for reptiles ahead of the equipment.

Sincerely,



Lee E. Carbonneau
As agent for Northern Pass Transmission, LLC.
Senior Principal Scientist
Normandeau Associates, Inc.

CC: Stephanie Labbe, Par-Electric
Kevin McCune, Northern Pass